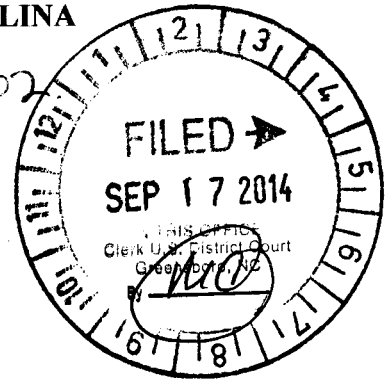


**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
GREENSBORO DIVISION**

**Case No:** ~~1:14CV468~~ 1:14 cv 802



**TAY**  
d/b/a DONTAVIOUS S. SMITH  
807 S. WILSON AVE  
COCOA, FL 32922

v.

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**RE: U.S. ATTORNEY GENERAL MIDDLE DISTRICT  
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**SCHOOL BOARD OF BREVARD  
COUNTY FLORIDA**  
2700 JUDGE FRAN JAMIESON WAY  
VIERA, FL 32940;  
321-633-1000

**SCHOOL BOARD OF BREVARD COUNTY FLORIDA**  
**DEPUTY SUPERINTENDENT d/b/a**  
**"LEROY BERRY" on, before and after February 9, 2009**  
2700 JUDGE FRAN JAMIESON WAY



VIERA, FL 32940;  
321-633-1000

**KATHY KRELL** individually and in her official capacity  
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School Board of Brevard County Florida  
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School Board of Brevard County Florida  
2700 JUDGE FRAN JAMIESON WAY  
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**JP MORGAN CHASE & CO.;**  
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**JP MORGAN CHASE ELECTRONIC  
FINANCIAL SERVICES INC.;**  
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(914) 253-2000;

**BRIGHTHOUSE NETWORKS, LLC**

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SUITE 1

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**d.b.a. DELL MARKETING L.P.**

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**SYMANTEC INC.**

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MOUNTAIN VIEW, CA 94043;

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**JOHN DOE a/k/a "Email Phisher"**

c/o MICROSOFT CORPORATION

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REDMOND, WA 98052;

**GOOGLE INC.**

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MOUNTAIN VIEW, CA 94043;  
(650) 253-0000

**FACEBOOK INC.** individually and on behalf of its members

MEGAN PHILMAN – PACE,  
ERIC LAMARR and others  
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MENLO PARK, CA 94025;

**TRACFONE WIRELESS INC.**

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**FOX ENTERTAINMENT GROUP INC.**

1211 AVENUE OF THE AMERICAS  
NEW YORK, NY 10036;  
212-852-7111

**NATIONAL FOOTBALL LEAGUE**

345 PARK AVE.  
NEW YORK, NY 10154, 1-212-450-2000

Defendant.

\_\_\_\_\_ /

**COMPLAINT**

Plaintiff, “Tay”, by and through indigent *Pro Se* makes this complaint against the Defendants and or RICO Defendants and alleges, upon information and belief, as follows:

**I. JURISDICTION**

1. This court has original jurisdiction over Tay’s claims pursuant to 18 USC § 1331 (Federal Question) under 42 USC § 1983 and under 18 USC § 1596(a)<sup>1</sup> [“Additional Jurisdiction in

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<sup>1</sup> Defendants and RICO Defendants committed crimes or attempted to or conspired to commit an offense(s) under 18 USC §§ 1581, 1583, 1584, 1589 and 1590 to place and keep Tay a below the poverty line participant as herein described which gives this Honorable Court jurisdiction over this case and Tay’s claims against Defendants and RICO Defendants as “nationals” or “aliens” lawfully admitted for permanent residence in the United States.”



certain trafficking cases”], as defined in 18 USC § 1595 (“Civil Remedy”), Tay is a victim of a violation of this chapter who may bring a civil action against the Defendants and or RICO Defendants (or whoever knowingly benefits, financially or by receiving anything of value from participation in a venture such as the Tay Tay Terror Attack which they knew or should have known has engaged in acts in violation of this chapter) in an appropriate district court of the United States and may recover damages and reasonable attorney fees. Tay also makes claims for relief arising under 18 USC § 1961 et seq. [“RICO”] pursuant to 18 USC § 1365(b)(e) (“Tampering with Consumer Products”), 18 USC § 1515(a)(3)... “Misleading conduct”... and exclusively part (E)... “knowingly using a trick, scheme or device with intent to mislead, (4) “law enforcement officer” and (6)... “corruptly persuades”; § 1513(a)(2)(B)(e) (“Retaliating against a witness, victim or informant”)... “interferences with lawful employment or livelihood of any person... § 1510(a) (“Obstruction of Criminal Investigations”); 18 USC § 1581 (“Peonage; Obstructing Enforcement”); 18 USC § 1584 (“Sale Into involuntary servitude”), 18 USC § 1589 (“Forced Labor”); § 1590 (“Trafficking with respect to peonage, slavery, involuntary servitude or forced labor”); § 1592 (“Unlawful conduct with respect to documents in furtherance of trafficking, peonage, slavery, involuntary servitude, or forced labor”), § 1593A (“Benefitting financially from peonage, slavery, and trafficking in persons”) pursuant to 18 USC § 1341 (“Frauds and Swindles”), § 1343 (“Fraud by wire, radio, or television”), §1344 (“Bank Fraud”), §1346 (“Scheme or artifice to defraud”), §1347(a)(1)(2) (“Health Care Fraud”); §1348 (“Securities and Commodities Fraud”), § 1349 (“Attempt and Conspiracy”), §1001 (“Statements or Entries Generally”), §1002 (“Possession of false papers to defraud United States”), §1018 (“Official Certificates or Writings”), §1031 (“Major Fraud Against The United States”), §1035 (“False



Statements relating to Health Care Matters”), §1037 (“Fraud and related activity in connection with e-mail and §1040 (“Fraud In Connection with Major disaster or emergency benefits”)... “food stamps”, medical assistance, Temporary Cash Assistance for Families with Children pursuant to FDCF assistance programs pursuant to Fl. Stat. § 409.18 amongst other crimes that caused Tay harm as hereinafter more fully appears.

2. There is also some diversity of citizenship between the parties and the amount in controversy exceeds \$75, 000 exclusive of interests and costs. Tay’s State law claims in this action arise out of a common nucleus of operative facts.
3. Thus this Court also has supplemental jurisdiction over Tay’s State law claims under 28 USC § 1367(a).
4. Subject matter jurisdiction is properly invoked pursuant to the Court’s original, concurrent and pendant jurisdiction as permitted by Federal and State law. By default, courts have supplemental jurisdiction over "all other claims that are so related . . . that they form part of the same case or controversy" (28 USC § 1367(a)). The true test being that the new claim "arises from the same set of operative facts." This means a federal court hearing a federal claim can also hear substantially related state law claims, thereby encouraging efficiency by only having one trial at the federal level rather than one trial in federal court and another in state court.
5. All Defendants are subject to jurisdiction in the Middle District of North Carolina pursuant to 42 USC § 1983.
6. LabCorp, a medical laboratory that has more than 34, 000 employees worldwide and over 220, 000 clients and third party clients that include Defendants and or RICO Defendants, State, School Board, and Neil Dash consist of other clients that are biotechnology and



pharmaceutical companies, that participated in the nefarious scheme [“Tay Tay Terror Attack”] to place, return and or keep Tay in poverty based on a falsified drug test by means of a confidence trick of an Equal Employment Opportunity which is headquartered in the state of North Carolina and this District<sup>2</sup>, which THEREFORE gives personal jurisdiction to all individual Defendants to this District upon its cohesive operating business activity from a “forced scheme to benefit” on, before and after February 9, 2009 in North Carolina with the School Board, the State, Neil Dash and others thereto pursuant to the *LabCorp Code of Business Conduct and Ethics*<sup>3</sup> and other compliance documents, terms and conditions that shall be construed in accordance with laws of the State of North Carolina. The “effect” of this falsified drug test scheme affected Tay’s religion, public figure Name and Likeness, livelihood, education and social – economic status forcing Tay to remain and reapply for food stamps every six months with the State, WHEREFORE are the reasons on and thereafter March 5, 2009, Tay’s Name and Likeness were publicly defamed; he were abused by initially appropriate Courts in the State of Florida; he received negligent or fraudulent feedback from individual Government officials and or Government agencies for his Notice of Claims and or Administrative Claims to State and or Government agencies pursuant to a falsified drug test scheme through its education system to a young, God-like, black, educated, African American and prominent businessman from Cocoa, FL. Tay<sup>4</sup> relied on LabCorp and

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<sup>2</sup> See <https://www.labcorp.com/wps/portal/aboutus/>.

<sup>3</sup> See

[https://www.labcorp.com/wps/wcm/connect/2a6d6600491c99a788c1a81dfe5dab3a/BPM27\\_False+Claims+Oct+2011.pdf?MOD=AJPERES&CACHEID=724da300491bb1718df39fd51fb14315&CACHEID=724da300491bb1718df39fd51fb14315](https://www.labcorp.com/wps/wcm/connect/2a6d6600491c99a788c1a81dfe5dab3a/BPM27_False+Claims+Oct+2011.pdf?MOD=AJPERES&CACHEID=724da300491bb1718df39fd51fb14315&CACHEID=724da300491bb1718df39fd51fb14315) (“Laboratory Corporation of America Holdings Business Practice Manual”, 2013)

<sup>4</sup> He is a 27 year old, God-fearing, single (8 USC § 1101(a)(39)), black, African American male with no children, nor a criminal record in local, state or Federal records or dockets. He is publicly known for his 2002 3A Florida State football Championship, 2002 Who’s Who Among America’s High School Students, FAMU NAACP Executive Committee, FAMU Student Government and Student Alumni





others dealings with his Chain of Custody form on and after February 23, 2009 and the *LabCorp Code of Business Conduct and Ethics* for an Equal Employment Opportunity<sup>5</sup> pursuant to N.C. Gen Stat. § 1 – 75.4(1)(d) because the Defendants engaged in substantial activity pursuant to the *LabCorp Code of Business Conduct and Ethics* for an Equal Employment Opportunity with the School Board as a substitute teacher within this State wholly interstate, intrastate or otherwise pursuant to the March 5, 2009 Document, and pursuant to (6)(a) made a promise in various places in the United States and outside the United States to Tay and or to School Board and or to Neil Dash to create in either Tay and or the School Board and or Neil Dash an interest in , or protect, acquire, dispose of, use, rent, own, control or possess by Tay and or the School Board and or Neil Dash real property in the State of North Carolina pursuant to the March 5, 2009 Document and Tay’s Florida Chain of Custody form, and pursuant to (6)(b) which arises out of a claim for any benefit derived by Defendants through the use, ownership, control or possession by Defendants of tangible property, such as Tay’s urine pursuant to the March 5, 2009 Document, situated in this state either at the time of its first use, ownership control or possession at the time it is commences.

7. This Court also has jurisdiction pursuant to 18 USC § 1345 (“Injunctions against fraud”)(1)(A) for violating or about to violate Ch 63 (mail, health care, food stamp and wire fraud), (B) committing or about to commit a banking law violation under 18 USC § 3322(d)(1)(B) by and thorough 18 USC §§ 1341 and 1343 affecting any and all financial institutions including the US Department of Treasury on, before and after February 9, 2009

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Associations, 2008 candidate for Mayor of Cocoa, and CEO of FOCUS Solutions Limited, Inc. as defined in FL. Stat. Title XXXVI, Ch. 607 (Corporations), and Folk Tell Publishing Group, Inc. See [www.smith4cocoamayor.webs.com](http://www.smith4cocoamayor.webs.com).

<sup>5</sup> The reason of Tay’s K-12 and K-20 education in the State of Florida, his awards, accolades, goals, character; pursuant to 20 USC § 6319, Tay is a public figure pursuant to Cocoa City Code Art. III – Sec. 3-27 and were approved by Cocoa on August 30, 2008 to promote his Exclusive Name and Likeness as a candidate for Mayor.



pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack and (C) committing or about to commit a health care offense, such as Tay's pre – employment drug test or Florida Chain of Custody form on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack, the Attorney General may commence a civil action in any federal court to enjoin such violation. Defendants are alienating and or disposing Tay's Data Info and his alleged drug test on February 24, 2009 on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack as a result of a banking law violation (under 18 USC § 3322(d)(1)(B) or a federal health care offense such as Tay's Florida Chain of Custody, or property such as the March 5, 2009 Document, which is traceable to such violation, the Attorney General may commence a civil action in any federal court to enjoin such alienation or disposition of property on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.

8. As defined in 18 USC 1956(b)(2) Jurisdiction over foreign persons.— For purposes of adjudicating an action filed or enforcing a penalty ordered under this section, the district courts shall have jurisdiction over any foreign person, including any financial institution authorized under the laws of a foreign country, against whom the action is brought, if service of process upon the foreign person is made under the Federal Rules of Civil Procedure or the laws of the country in which the foreign person is found, and— **(A)** the foreign person commits an offense under subsection (a) involving a financial transaction that occurs in whole or in part in the United States; **(B)** the foreign person converts, to his or her own use, property in which the United States has an ownership interest by virtue of the entry of an



order of forfeiture by a court of the United States; or (C) the foreign person is a financial institution that maintains a bank account at a financial institution in the United States.

9. This Court has jurisdiction over this matter pursuant to 18 USC § 1956(b)(2) and (i) because the foreign persons commits an offense under subsection (a) as stated herein involving a financial transaction that occurs in whole or in part in the United States and or the foreign person is a financial institution that maintains a bank account at financial institutions, including but not limited to AIG, Chase, U.S. Department of Treasury, the Federal Reserve, National Collegiate Trust, Bank of America, Citibank, the Royal Bank of Canada (RBC Bank), GCO Loan Funding, Wells Fargo, PNC Bank, Wilmington Trust Co. N.A., Barclays Delaware, Citigroup, Capital City Bank, Discover, New York Stock Exchange, gurufocus.com, VISA, Student Loan Trust, GCO Funding, World Economic Forum, Wal Mart, Publix, Western Union, Capital One, Community Credit Union, Space Coast Credit Union, FIA Card Services, RBC Capital Markets, Investor's Business Daily, Money Gram, Legacy Visa, Net Spend, ACE Cash, Regions Bank and Morgan Stanley who are herein therefore financial institutions as defined in (18 USC § 20) and or depository institutions pursuant to 12 USC § 1813(c)(1) that affected and or caused to be affected interstate and foreign commerce before and after March 5, 2009 pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack on, before and or after February 9, 2009. These mentioned financial institutions and or Defendants provided or obtained the financial institution and or financial services; monetary transactions; extorted and laundered money; financial currency amongst other labor or services from or of Tay pursuant to the March 5, 2009 Document and the Tay Tay Terror Attack on, before and after February 9, 2009.



10. This case is pertaining to schemes against Tay, a trafficking victim, who have been deprived of his human rights specifically pertaining to an illegal and fraudulent drug test produced allegedly on, before and after February 9, 2009 that Defendant, LabCorp conducted in its Merritt Island, FL location on February 23, 2009 with co-conspirator non-Defendant, LCA Courier, to traffic Tay's urine to Medical Examiner and Defendant, Neil Dash, examining Tay's drug test to further notify Defendant, School Board, as indicated on the Chain of Custody form on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack submitted hereto as Exhibit 11.
11. This venue is just pursuant to Rule 1 of the Fed. Rules of Civ. P. due to the State of Florida providing Tay prejudicial "void judgments" to deny him relief and or access to the Courts to receive his due relief pursuant to Rule 60(b), THEREFORE the State of Florida and its Districts would provide Tay an injustice to his claims for relief and material facts that have and can be proven at trial and this Court is proper for the reasons as mentioned herein.
12. World Justice Project Rule of Law Index;
13. Customary International Law
14. Universal Declaration of Human Rights, G.A. res 217A (iii), U.N. Doc. A/810 (1948);
15. International Covenant on Civil and Political Rights, G.A. Res. 2220A (xxi), 21, U.N. Doc., G.A. or Supp. (No. 16) at 52, U.N. Doc. A/11316 (1966);
16. Declaration on the Protection of all Persons from being subjected to torture and other cruel, inhuman, or degrading treatment or punishment, G.A. Res. 3452, 30 U.N., G.A or Supp. (No. 34) at 91 U.N. Doc. A/10034 (1976).
17. 28 USC § 1350 [The Torture Victim Protection Act];



18. Pursuant to FRCP Rule 11(B)(1) and (3)... 1) this complaint is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation... 3) the factual contentions have evidentiary support.

- a. This is a Title 18 USC § 241, § 242, § 371, §665 (“Theft or embezzlement from employment and training funds; improper involvement; obstruction of investigations”), §669 (“Theft or Embezzlement with Health Care”), § 1001, § 1018 (“Official Writings and Certificates”), § 1028, § 1035, § 1341, § 1343 and § 1346, § 1365, and § 1505, 1515(3), 1518, 1581, 1589 and § 1621 action. [Hereinafter, “Defendant’s War Crimes”]
- b. “Title 42 USC § 1983 authorizes suits against State and local officials based on Federal Statutory, as well as constitutional rights. *Blue v. Craig* 505 F. 2d 830 (4 Cir. 1974)
- c. “Section 1983 remedy broadly encompasses violations of the federal statutory as well as constitutional law.” Cf. e. g. *Ronado v. Wyman*, 397 U.S. 397, *Edelman v. Jordan*, 415 U.S. 651; *Mowell v. New York City Dept. of Social Services*, 436 U.S. 658. Pp 448 U.S. 4-8. See also *Maine v. Thibouttot*, 448 U.S. 1 (1980). See also *Colorado River Water Conservation Dist. v. U.S.* 424 U.S. 800, 813, 817-818. Also Title U.S.C. 18 § [1505] applies to civil as well as criminal proceedings, *Roberts v. United States*, 239 F. 2d, 467, 470 (9 Cir. 1956) *Sneed v. United States*, 298 F. 911, 912 (5 Cir.), cert. denied, 265 U.S. 590 (1924); See Also *Nye v. United States*, 137 F. 2d 73 (4 Cir.)
- d. Tay request this Court to hear the Title 18 USC § 241, and Title 18 USC § 242, and Title 18 USC § 371, Title 18 USC § 665 (“Theft or embezzlement from



employment and training funds; improper involvement; obstruction of investigations”), and Title 18 USC § 1001, Title 18 USC § 1002, Title 18 USC § 1018 (“Official Certificates and Writings”), and Title 18 USC § 1028, Title 18 USC § 1035, Title 18 USC § 1341, Title 18 USC § 1343, Title 18 USC § 1349, Title 18 USC § 1346, 1365 (“Tampering with Consumer Products”), and Title 18 USC § 1505, 1515(3), 1518, 1581, 1589 and Title 18 USC § 1621 complaints as all are intertwined and needed for full compact and story. [Defendants War Crimes]

All above are federal laws. In addition, the following gives this court jurisdiction:

19. This is a civil rights action arising under Federal question pursuant to 28 U.S.C. §1331 (1993), 28 USC § 1343(a)(3) and (4), and 28 USC § 1367 in the United States District Court for the Middle District of North Carolina. Jurisdiction may also be appropriate under 42 U.S.C. §§ 1981, 1982, 1983, 1985(3) and 1986, as amended by the Civil Rights Act of 1991.
20. At all times relevant herein, the Defendants were State actors operating and engaging in State actions under Color of Law and their conduct was also subject to 42 U.S.C. § 1981, §1981a, §1982, § 1983, §1985, § 1986, § 2000e, the Title 18 statutes and various North Carolina and Florida state law and tort claims herein.
21. Under the FTCA, the federal government becomes liable “in the same manner and to the same extent as a private individual under like circumstances.” 28 U.S.C. §2674. The district courts have exclusive jurisdiction of civil actions against the United States “for money damages . . . injury or loss of property, or personal injury or death caused by the negligent or wrongful act or omission of any employee of the Government while acting within the scope of his [her] office or employment”. 28 U.S.C. §1346 (b)(1).



22. This process is intended to provide sufficient notice to the United States so that it can investigate the alleged incident of negligence. *Lopez v. U.S.*, 758 F.2d 806, 809-10 (1st Cir. 1985). Thus, §2675 emphasizes that an agency must receive “enough information” in the claim filed in order to begin investigation. *Santiago-Ramirez v. Secretary of Dep’t of Defense*, 984 F.2d 16, 19 (1st Cir. 1993).
23. Venue is proper under 28 USC § 1391(d)(e), and also under 18 USC § 1965.
24. This Court’s venue shall be unaffected upon the facts, corroborating evidence and Federal Rules of Civil Procedure pursuant to Fed. R. Civ. P. Rule 82.
25. “Municipalities are persons under section 1983” *Edelman v. Jordan*, 415 U.S., 651, 415 U.S. 675 (1974). See also *Will v. Michigan Department of State Police*,” a municipality is a person under the law” 491 U.S. 58, 109 S. Ct. 2304, 105 L. Ed. 2d. 45 [1989]. The School Board and BCC are also a corporate municipality.
26. Defendants, RICO Defendants and Co-Conspirator Non-Defendants engaged in State Actions under the Pinkerton Rule pursuant to the Cocoa Comprehensive Plan 15-5, FL. Stat. 1012.98 pursuant to the State and Florida’s Space Coast on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.
27. The government may abridge the freedom to associate directly, or . . . , even though unintended, [indirectly] . . . . Thus, the government must justify its actions not only when it imposes direct limitations on associational rights, but also when governmental action would have the *practical effect* of discouraging the exercise of constitutionally protected human rights. Such actions have a chilling effect on, and therefore infringe the exercise of fundamental rights. . . . *Perry v. Schwarzenegger*, 591 F.3d 1147, 1159–60 (9th Cir. 2010),



*cert. dismissed*, 130 S. Ct. 2432 (U.S. 2010) (emphasis added) (citations and internal quotation marks omitted).

28. “Government employees act under color of law when performing their duties, whether they act in compliance with State law, or contrary to it, or exercise professional discretion.” See *Monroe v. Pape*, 365 U.S. 167 (1961) reviewed on other grounds, *Monell v. Dept. of Soci. Serv.*, 436 U.S. 658, 690-91 (1978) West, 487 U.S. at 49-50. “Actions contrary to state law area also actions under color of law because employees are given the power to act on behalf of the government. *Monroe*, 365 U.S. at 176, rev’d on other grounds, *Monell v. Department of Social Services* 436 U.S. 658 (1978), 98 S. Ct. 2018, 56 L. Ed. 2d 611 (1978). In the above cases The Supreme Court began accepting an expensive definition of rights, privileges or immunities and held the act (1983) “does cover the actions of state and municipal officials, even if they had no authority under state statute as they did violating someone’s federal rights”. See also Supreme Court construed the provision “Under Color of Statute” to include virtually any state action including the exercise of power of one” possessed by virtue of state law and make possible only because the wrongdoer is clothed with the authority of state law” *United States v. Classic*, 313 U.S. 299, S. Ct. 1031, 85 L. Ed. 1368 [1941], “local officials may be sued in their” personal capacity “where suit seeks to impose individual personal liability on the government officer for actions taken under color of state law with the badge of state authority.” *Hafer v. Melo* 502 U.S. 21, 112 S. Ct. 358 (1991). “willful participant in activity with state or agents”. *Adickes v. Kress* 398 U.S. 144, 152, (1970)

“underlying the [business (before and after February 9, 2009)] rule is the assumption that reasonable diligence has been used in reaching the decision which the rule is invoked to justify.” (Slip Op. @ 18-19, quoting *Miller v. American Tele. Tel. Co*, 507 F. 2d 759, 762 (3d Cir. 1974)).





It is thus material whether [Tay's] reliance upon the information provided by one or more officers and employees [and agencies] was in "good faith", and whether there was a reasonable basis for relying upon officers have exercised "reasonable inquiry, skill and diligence in performing duties." (Slip Op @16) as directly stated to LabCorp. "The relations and duties involved need not be legal, but may be moral, social, domestic and merely personal.") *Kaser v. Swann*, 141 F.R.D. 337, 341 (M.D. Fla 1991). *Tardit v. People for the Ethical Treatment of Animals*, 160 Lab. Cas. P61065 (M.D. Fla. 2010) (2:09-cv-537-FM-29SPC). The RICO Defendants and employees on behalf of the School Board, and on behalf of Leroy Berry, Kathy Krell, LabCorp, the Florida Board of Education and the Florida Department of Education and the State created and distributed vital information to Tay "with knowledge that [it were]... false or with reckless disregard of whether [it were] false or not," *New York Times Co. v. Sullivan*, 376 U.S. 254, 280 (1964).

## **II. Parties**

29. Plaintiff, Tay d/b/a Dontavious Sherrode Smith is a public figure that is a victim of modern day human trafficking schemes to be placed and or returned to poverty by Defendants and RICO Defendants.
30. The Complaint must inform each Defendant of his or her alleged participation in the fraudulent scheme. "A plaintiff who pleads fraud must reasonably notify the Defendants of their purported role in the scheme." *Id. Brooks v. Blue Cross Blue Shield of FL.*, 116, F. 3d 1364, 1381 (11<sup>th</sup> Cir. 1997).
31. The Defendants and or RICO Defendants listed in the following paragraphs are the individuals and or organizations who have conspired to engage in a pattern of racketeering activity, have each committed numerous criminal acts as part of their scheme to defraud and



extort Tay, and have each participated in the operation or management of the criminal enterprise. Defendant, Barack Obama engaged in a nefarious scheme to return, place and or keep Tay in poverty in which subjects, or causes to be subjected, Tay within the jurisdiction thereof and deprived Tay the right to a government free from corruption, fraud and dishonesty on, before and after February 9, 2009 pursuant to the herein March 5, 2009 Document and or Tay Tay Terror Attack, transmitted by means of wire, radio, or television communication in interstate of foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing the Tay Tay Terror Attack<sup>6</sup> on, before and after February 9, 2009 pursuant to 18 USC § 1343 and provided, obtained and or benefitted from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.

32. Defendant, Marissa Pizarick engaged in a nefarious scheme to return, place and or keep Tay in poverty individually and in her capacity of for the U.S. Department of Justice provided, obtained and or benefitted from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.

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<sup>6</sup> “Tay Tay Terror Attack” means a timeline of influence, enticement, harmful and unhelpful, fraudulent and misleading acts and attempted acts that have been labeled as “terrorism”<sup>6</sup> and or “threats” and have been carried out by the Defendant, its forces and or its affiliates on Tay and his Likeness including but not limited to paragraph 1; a K-20 education curriculum, a School Board employment hoax, food stamp poverty, and a social media campaign to impugn Tay’s character and goodwill pursuant to 18 USC § Chapter 113B (Terrorism) and exclusively including but not limited to 18 USC § 2331(5) (Domestic Terrorism); and or § 2332A(a)(2) (Use of Weapons of Mass Destruction) [hereinafter, “Defendants Weapons of Mass Destruction”]; and or §2332D (Financial Transactions); and or §2339 (Harboring or Concealing Terrorist); and or §2339A (Providing Material to Support to Terrorist); and or §2701 (Unlawful Access to Stored Communications; and or §2339C(a)(1)(B) and (2) and (3) (Prohibition Against the Financing of Terrorism; and or 18 USC § 2381 (Treason).



33. Defendant, Naomi Randolph engaged in a nefarious scheme to return, place and or keep Tay in poverty individually and in her capacity as U.S. Department of Education is an agency of the United States provided, obtained and or benefitted from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.
34. Defendant, William Biglow engaged in a nefarious scheme to return, place and or keep Tay in poverty individually and in his official capacity as U.S. Department of Health and Human Services is an agency of the United States provided, obtained and or benefitted from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.
35. Defendant, Lisabeth Bailey engaged in a nefarious scheme to return, place and or keep Tay in poverty individually and in her official capacity as Investigator for the U.S. Equal Employment Opportunity Commission, a agency of the United States provided, obtained and or benefitted from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.
36. Defendant, James Clapper and the NSA engaged in a nefarious scheme to return, place and or keep Tay in poverty which has transmitted by means of wire, radio, or television communication in interstate of foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing the Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to 18 USC § 1343 and provided, obtained and or benefits from Surveillance Data labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.



37. Defendant, Thomas Perez and the U.S. Department of Labor is an agency of the United States that engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and or benefitted from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.
38. Defendant, Jacob Lew and the U.S. Department of Treasury, a agency of the United States engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and or benefitted from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.
39. Defendant, Tom Vilsack and the U.S. Department of Agriculture, an agency of the United States, engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained, and benefits from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.
40. Defendant, National Aeronautical Space Administration ("NASA"), a United States agency that has engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained, and benefits from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.
41. Defendant, Rick Scott, engaged in a nefarious scheme to return, place and or keep Tay in poverty in which provided, obtained and or benefitted from human capitol labor or services



of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.

42. Defendant, James Peters, is a Special Counsel for the State of Florida (the “State”) that has engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and or benefits from Tay’s litigation labor or service of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.
43. Defendant, Mike Carroll is the Secretary of the Florida Department of Children and Families and has engaged in a nefarious scheme to return, place and or keep Tay in poverty in which provided, obtained, and benefits from Tay’s food stamp and unemployment labor or service of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.
44. Defendant, Pam Stewart is the Commissioner of Education in the State of Florida (the “State”) engaged in a nefarious scheme to return, place and or keep Tay in poverty that provided, obtained and benefits from education labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.
45. Defendant, School Board of Brevard County, FL (hereinafter, the “School Board”) is the school district of Brevard County pursuant to FL. Stat. 1001.30 – 1001.33 who engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and or benefitted from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.



46. Defendant, School Board of Brevard County Deputy Superintendent (a/k/a “Leroy Berry”), on March 5, 2009 was Leroy Berry who has since retired from the School Board engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and or benefitted from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.
47. Defendant, Kathy Krell, is the School Board or Brevard Public Schools Drug and Alcohol Manager for applicants and employees of the School Board that related Tay’s Chain of Custody Data Info to Leroy Berry and State engaged in a nefarious scheme to return, place and or keep Tay in poverty provided, obtained and or benefitted from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.
48. Defendant, James Kaczowski, Substitute Teacher Coordinator for the School Board who trained Tay through the employment hoax engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and or benefitted from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.
49. Defendant, Neil Dash is directed to identify, review and confirm specimen results in accordance with Florida Drug Free Workplace Program in § 112.0455, Fl. Stat. 59A-24 on behalf the State and School Board engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and or benefitted from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.



50. Defendant, Laboratory Corporation of America Holdings, (“LabCorp”) on behalf of LabCorp FLD 53; which is the collection site that receives specimen for the School Board’s pre-employment procedure for its applicants engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and or benefitted from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.
51. Defendant, JP Morgan Chase & Co. (“Chase”) is headquartered and operates the food stamp scheme at 270 Park Ave, New York New York, 10017-2014 engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and or benefitted from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.
52. Defendant, J.P. Morgan Chase Bank N.A. (“Chase” and or “Washington Mutual”) is an American multinational banking and financial services holding company that provides the State’s food stamp recipients with the SNAP benefits card, and solicited to Tay the Chase Business Card with a premiere Cash Rebate as owner of Folk Tell Publishing Group Inc who engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and or benefitted from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.
53. Defendant, JP Morgan Chase Electronic Financial Services Inc. (“Chase”) is headquartered and operates the food stamp scheme at 270 Park Ave, New York New York, 10017-2014 that transmitted by means of wire, radio, or television communication in interstate of foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing the



Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to 18 USC § 1343, who engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and or benefitted from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.

54. Defendant, Jennifer J. Johnson individually and in her official capacity as Secretary for the Board of Governors of the Federal Reserve System (“Federal Reserve”) which is headquartered and operated at 20th Street & Constitution Avenue, NW, Washington, DC 20551 who engaged in a nefarious scheme to return, place and or keep Tay in poverty provided, obtained and or benefitted from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.

55. Defendant, American International Group, Inc. (“AIG<sup>7</sup>”) is a financial institution (18 USC § 1956(c)(6)) for American and International insurance and financial services organization, with operations in approximately 130 countries and jurisdictions. A United States government controlled Financial Institution (18 USC § 20) by and through 12 USC § 1828 acting as or being an officer, director or agent or employee of Tay engaged in the business of insurance whose activities affect interstate commerce with intent to obstruct a judicial proceeding, directly or indirectly. AIG is the liability insurance holder for the School Board that engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and or benefitted from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.

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<sup>7</sup> [http://www.nytimes.com/2008/09/17/business/17insure.html?pagewanted=all&\\_r=0](http://www.nytimes.com/2008/09/17/business/17insure.html?pagewanted=all&_r=0)





56. Defendant, Nike Inc. (“Nike”) sponsors or endorses Cocoa High School [School Board] as a Nike Elite sporting program and or sponsorship and other high schools and universities in the [State] and nation, and is an American multinational corporation that is engaged in the design, development and worldwide marketing and selling of footwear, apparel, equipment, accessories and services, in which devised the Nike Elite sponsorship scheme for exchanging money and or merchandise to the School Board to market and advertise through Cocoa High School student – athletes, faculty, staff, alumni and fans a “Equal Employment Opportunity” and to a uniform, efficient, safe, secure and high quality operation under Article IV § 1 Fla. Const. for obtaining money or property from consumers by means of false and fraudulent pretenses, representations and promises of a Equal Employment Opportunity and to a uniform, efficient, safe, secure and high quality operation under Article IV § 1 Fla. Const. pursuant to the March 5, 2009 Document and the Tay Tay Terror Attack, transmits and caused to be transmitted by means of television communication, computer, cell phones, and radio in interstate or foreign commerce, any writings, signs, signals, pictures and or sounds for the purpose of executing the March 5, 2009 Document and or the Tay Tay Terror Attack who engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and or benefitted from human capitol labor or service of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack. NYSE:NKE

57. Defendant, Microsoft Corporation (“Microsoft”) supports a range of software products and services for various computing devices worldwide that transmitted by means of wire, radio, or television communication in interstate of foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing the Tay Tay Terror Attack on, before and



after February 9, 2009 pursuant to 18 USC § 1343, engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and or benefitted from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.

58. Defendant, Pepsi Co. Inc. (“Pepsi” or “Tropicana”) is an American multinational food and beverage corporation headquartered in Purchase, New York, United States, with interests in the manufacturing, marketing and distribution of grain-based snack foods, beverages, and other products that transmitted by means of wire, radio, or television communication in interstate of foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing the Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to 18 USC § 1343, engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and or benefitted from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.

59. Defendant, McDonald’s Corporation USA d/b/a [www.365black.com](http://www.365black.com); is a program geared toward African Americans in low income communities, HBCU’s and other black citizens that transmitted by means of wire, radio, or television communication in interstate of foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing the Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to 18 USC § 1343 who engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and or benefitted from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.



60. Defendant, National Collegiate Loan Student Trust are a series of individual Delaware business trusts registered with the U.S. Securities and Exchange Commission under the respective trust title as according to the date of issue that engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and or benefitted from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.
61. Defendant, GCO Education Loan Funding Corp. operates as a specialty finance company that serves as a secondary market for federally supported student loans in the United States that engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and or benefitted from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.
62. Defendant, James “Jim” Skinner is being sued individually as former McDonald’s Corporation USA CEO and or Board Member, as Walgreen Co. (“Walgreens”) (NYSE:WAG) current Chairman, and as Hewlett Packard’s (“HP”) (NYSE: HPQ) current Board Member and operating the “*Deeply Rooted*” in the Community 365 Days A Year scheme against Tay that engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and or benefitted from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.
63. Defendant, Bill and Melinda Gates Foundation are, globally, to enhance healthcare and reduce extreme poverty, and in America, to expand educational opportunities and access to information technology that transmitted by means of wire, radio, or television



communication in interstate of foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing the Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to 18 USC § 1343, engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and or benefitted from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.

64. Defendant, GovConnection, Inc. is a PC connection company that specializes IT needs of federal, state, and local governments and academic institutions (K-12 and higher education) throughout the United States that transmitted by means of wire, radio, or television communication in interstate of foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing the Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to 18 USC § 1343, engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and or benefitted from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.

65. Defendant, SHI International Corp. is a leading corporate reseller of software, hardware, and related services, providing government agencies, educational agencies software and other related services transmitted by means of wire, radio, or television communication in interstate of foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing the Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to 18 USC § 1343, engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and or benefitted from human capitol labor or services of



Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.

66. Defendant, John Doe aka “Email Phisher” is the phisher that stole Tay’s Name and Likeness from his email account with MSN Hotmail engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and or benefitted from human capitol labor or services of Tay.
67. Defendant, TRUSTe Inc. (“TRUSTe”) who is the leading global data privacy management solutions provider that transmitted by means of wire communication in interstate of foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing the Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to 18 USC § 1343, engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and or benefitted from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.
68. Defendant, James R. Clapper individually and in his official capacity of Director of National Intelligence for the United States Intelligence Community and is the Co-Mastermind of the RICO scheme engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and or benefitted from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.
69. Defendant, John Doe a/k/a “Malware Computer Hacker” hacked Tay’s computer and locked him from use. Malware Computer Hacker is served and in Care Of Defendant, National Security Agency until discovery and disclosure reveals John Doe provided, obtained and or



benefitted from human capitol labor or services of Tay that engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and or benefitted from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.

70. Defendant, National Aeronautics Space Administration (“NASA”) is a United States government controlled program that transmitted by means of wire, radio, or television communication in interstate of foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing the Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to 18 USC § 1343 and forced, threatened, harmed in which engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided or obtained and benefitted from education, student athlete activities, recognitions, technology labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.

71. Defendant, Symantec, Inc. is a global data privacy management provider that transmitted by means of wire communication in interstate of foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing the Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to 18 USC § 1343, engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and or benefitted from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.

72. Defendant, Google Inc. (“Google”) is an American multinational corporation specializing in Internet-related services and products. These include online advertising technologies, search, cloud computing, and software that transmitted by means of wire, radio, or television



communication in interstate of foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing the Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to 18 USC § 1343, engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and or benefitted from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.

73. Defendant, Facebook Inc. (“Facebook”) is an online social networking service that transmitted by means of wire, radio, or television communication in interstate of foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing the Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to 18 USC § 1343, engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and benefitted from social media labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.

74. Defendant, Yahoo! Inc. (“Yahoo”) is an American multinational Internet corporation that schemed against Tay in the NSA Scheme to illegally surveillance Tay, and collects his data information on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack and transmitted by means of wire, radio, or television communication in interstate of foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing the Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to 18 USC § 1343 engaged in a nefarious scheme to return, place and or keep Tay in poverty.



75. Defendant, Dell Computer Marketing Limited Partnership d.b.a. Dell Marketing L.P.

("Dell") agreed with the School Board, SHI, Microsoft and GovConnection to license software for the herein March 5, 2009 Document and the Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack engaged in a nefarious scheme to return, place and or keep Tay in poverty.

76. Defendant, Western Union Holding Inc. is the monetary transmitting business and or service pursuant to 31 USC 5330(1)(2) that engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and benefited from financial labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.

77. Defendant, Tracfone Wireless Inc. transmitted by means of wire communication in interstate of foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing the Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to 18 USC § 1343, engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and benefited from food stamp labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.

78. Defendant, Fox Entertainment Group Inc. owns ("Sunshine Network") or currently named Fox Sun Sports transmitted by means of wire, radio, or television communication in interstate of foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing the Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to 18 USC § 1343, engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and benefited from human capitol labor or services of Tay





on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack.

79. Defendant, National Football League (“NFL”) transmitted by means of wire, radio, or television communication in interstate of foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing the Tay Tay Terror Attack on, before and after February 9, 2009 with Dirty Money from the Tay Tay Terror Attack and or the [NFL – Xbox NFL Street Unplugged project] pursuant to 18 USC § 1343 and 1344, engaged in a nefarious scheme to return, place and or keep Tay in poverty and provided, obtained and benefited from human capitol labor or services of Tay on, before and after February 9, 2009 pursuant the herein [NFL – Xbox NFL Street Unplugged project] and the March 5, 2009 Document and the herein Tay Tay Terror Attack.

80. Each Defendant herein, named and unnamed, did knowingly drive some form of profit or benefit from the acts and omissions described herein.

81. The Defendants and or RICO Defendants’ criminal scheme has five main lines of attack within the Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to the March 5, 2009 Document: One, raise and develop Tay in a single parent - low income, low educated community while receiving a free K-12 education with the School Board, forcing him to get good grades, be a prominent student athlete to profit off of Tay, pass ACT or SAT tests and show good character to get accepted to FAMU and do the same. Two, market and advertise the American Dream and or an Equal Employment Opportunity and a quality education in the State to coerce Tay to invest in his Self Made American Dream and or education and or the teaching profession for an employment hoax. Three, corrupt the Sham 2009 Litigation and obtain a fraudulent judgment against Tay based on a manufactured



evidence of liability. Four, to conduct a campaign designed to spread false facts and misleading information about Tay and the Smith 2009 Litigation. And five, to keep Tay in poverty to profit financially off of the Tay Tay Terror Attack so Tay could not become a prominent CEO, author, entrepreneur, and most importantly a God fearing - wealthy family man.

82. Defendants and or RICO Defendants joint ventures, projects and partnerships within the Tay Tay Terror Attack include, but are not limited to: Sunshine Connections; Dell, School Board, SHI and Gov Connections computers and computer programs; Cocoa High [School Board] and Nike endorsement; Florida Department of Education partnerships before and after February 9, 2009; School Board and Pepsi Agreement; FHSAA and Sunshine Network; College Ready Education and or the Secondary Schools of National Prominence [Bill and Melinda Gates Foundation]; the Florida Classic; Talented 10<sup>th</sup>; 365 Black; Atlanta Football Classic; FAMU, NCAA, CLC collegiate licensing; Jay Z and Microsoft; Beats and any celebrity name and likeness; Operation Reveal the Deal; Florida Food Stamps; Employ Florida; State's Chain of Custody; School Board Employment; Drug Free Workplace; NFL, MLB, NCAA, NBA arenas and stadiums; Tom Joyner Foundation and Royal Caribbean; Justia, Facebook, Google; Web Partner Program; NCAA or NFL or NCAA or MLB and New Era; Nike and Jordan, or Tiger Woods, or LeBron James, or Deion Sanders, or Rick Ross and or any other celebrity name and likeness representing Nike products; Junior Magic [NBA] and Cocoa; Black Enterprise and Pepsi Golf Challenge; Essence Music Festival; EA Sports, NCAA, ESPN, CLC; NFL Super Bowl and their sponsors; NBA sponsors and affiliates; MLB sponsors and affiliates; NFL/Xbox Street, EA Sports, Microsoft; ESPN, ABC and NCAA; NCAA Bowl Championship Series bowl games; FAMU and Magic Johnson; FAMU



and NBA; T Mobile and any celebrity name and likeness used to promote T Mobile products; VISA card logo and sponsorships; Viacom,; and other sponsorships and any celebrity name and likeness representing or promoting Defendants and or RICO Defendants products; Brevard Career Expo; and FAMU Career Expo, including others.

### **IMMUNITY**

83. Where “there can be no doubt that section 1 of the Civil Rights Act [1871] was intended to provide a remedy, to be broadly construed against all forms of official violations of federally protected rights.
84. Similarly, *Owen v. City of Independence*, 445 U.S. 622, U.S. 649 (1980) in holding that the common law immunity for discriminatory functions provided no basis for according municipalities a good faith immunity under Section 1983, noted that a court “looks only to whether the municipality has conformed to the requirements of the federal Constitution and statutes.” *Mitchum v. Foster*, 407 U.S. 225, 407 U.S. 240, n. 30 (1972), and *Lynch v. Household Finance Corp.*, 405 U.S. 543, n. 7 (1972), noted that Section 1983’s predecessor “was enlarged to provide protection rights, privileges, or immunities secured by federal law.” *Greenwood v. Peacock*, 384 U.S. 808, 384 U.S. 829-830 (1966), observed that, under Section 1983, state “officers may be made to respond in damages not only for the violation of rights confirmed by federal equal civil rights laws, but for violations of other federal constitutional and statutory rights as well.”
85. Title 42 USC 1981, 1981a, 1982, 1983, 1985, 1986 and 2000e “authorizes suits against State and local officials based upon federal statutory, as well as constitutional rights.” See *Blue v. Craig*, 505 F. 2d 830 (4 Cir. 1974).
86. There is no immunity for Title 18 USC Section 371.



- a. Tay affirms Defendants have violated his United States Constitutional rights, and rights under the Federal Statutory, that is, Violation of liberty, property, substantive due process and equal protection all guaranteed under amendment V and XIV, Equal protection under the law Amendment XIV, taking private property for public use amend V and article VII amendment I, right to present full and complete evidence for the fair administration of justice. All in violation Title 42 USC 1981, 1982, 1983, 1985, 1986, 2000e and Title 18 USC 242. All based on the United States Constitution. Tay have stated violations of Constitution and Statutory law, all being, plain, simple, and settled law with contours of rights sufficiently clear that a reasonable official would understand that what [he or she] is doing violates that right. (Harlow Test) Defendants have acted with reckless and callous indifference to matters in this case.

87. There is no immunity for violation of Title 18 USC Section(s) 241 (Conspiracy Against Rights), 242 (Deprivation of rights under color of law), 371, 665, 669, 1001, 1002, 1017, 1018, 1028, 1035, 1341, 1343, 1349, 1346, 1365, 1505, 1515(3), 1518, 1581, 1582, 1583, 1589, 1592 and any and or all herein pursuant to and or incorporated. Wherefore all Defendants are absent immunity under Title 42 USC §§1981, 1982, 1983, §1985, §1986, §2000e, and Title 18 USC Section(s) §241, §242, §371, §§665, §669, §1001, §1002, §1017, §1018, §1028, §1035, §1341, §1343, §1349, §1346, §1365, §1505, §1515(3), 1518, 1581, §1582, §1583, §1589, §1592, §1621 and any and or all herein pursuant law or incorporated Crimes. [Hereinafter, "Defendants War Crimes"]

**Pre Suit Requirements**



88. The Federal Rules of Civil Procedures were created in order to manage litigation. Said rules, however, were intended to provide a reasonable time frame in which a trained professional, by the virtue of his or her training, was actually (humanly) capable of crafting a certain document within the promulgated time frames. Moreover, the Federal Rules of Civil Procedure or any other such Rules were written by attorneys (and judges) for attorneys. In other words: Defendants through Counsel are trained to operate within the Rules, Tay is not. Tay was *forced* to meet “Notice” requirements by the State and the United States or he would not be able to receive justice and or any relief.
89. Tay has met “Notice” requirements and has exhausted his pre-suit requirements and administrative remedies. It is well established that “one who is damaged as a result of a tort that is actually committed by a corporate agent may sue either the individual agent...or the corporation...or the injured party can sue both.” See *Smith v. Hawks*, et al., 182 Ga. App. 379, 384, 355 S.E.2d 669 (1987). Pursuant to FL. St. 768.28 (6)(a), (6)(b), (16), (18)-(20) and Exhibit 1.
90. Tay sent certified mail a Notice of Claim letter to Governor Rick Scott on March 1, 2012 which was received on March 5, 2012.
91. On or around April 3, 2012 without Certified Mail and July 12, 2012 Tay sent a Notice of Intent to Sue letter to Cocoa, Florida Department of Financial Services pertaining to the scheme by the Brevard Public Schools and Brevard County Clerk of Circuit Court with evidence as Certified Mail with a return receipt.
92. As well as to Barack Obama and Eric Holder concerning the issues of Tay’s Name and Likeness as a public figure as they failed to respond to Tay and his Notice of Claim. Including also the Florida Department of Health and Human Services, Florida Attorney



General Pamela Jo Bondi, the U.S. Department of Health and Human Services, U.S. Department of Education, the U.S. Department of Justice, the U.S. Equal Employment Opportunity Commission, and the U.S. Department of Labor as Certified Mail.

93. The facts are that Tay has filed the notice requirement with the Department of Financial Services, the mandatory six-month waiting period in which the Department of Financial Services is required to respond has elapsed, and the department has failed to respond to Tay within the statutory time period.

94. Tay contacted the U.S. Equal Employment Opportunity Commission around November 9, 2009 initially online through a computer questionnaire, and then was referred to call the EEOC Miami office for further procedures. Tay spoke to an EEOC Representative named Debra giving the details of the discrimination believing that he were filing a proper claim with the EEOC. Tay has not received a right to sue letter from the EEOC.

#### **PINKERTON RULE**

95. “The act of one conspirator is the act of all, and one conspirator is liable for coconspirators acts.” *Pinkerton v. U.S.*, 328 U.S. 640 66 S. Ct. 1180, 90 L. Ed. 1489, (1946)

96. All named and unnamed Defendants, and co-conspirator non-Defendants all share relationships<sup>8</sup> with each other by, through and pursuant to but not limited to: 26 USC § 7701 (as defined in), 20 USC § 7801(3)(8)(10)(21)(24)(34)(37)(43), Fl. Stat. 1008.31, FL. Stat. 1012.98, FL. Stat. § Ch. 1011, 12 USC § 1828 (Regulations governing insured depository institutions), FL. Stat. 1012.98 (School Community Professional Development Act); 20 USC § Ch. 17 VIII; 12 USC § 5463; Fl. Stat. 112.24; Fl. Stat. 1011.62; Cocoa ordinance 15-5 [Tay

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<sup>8</sup> See

<http://www.recovery.gov/arra/Pages/textview.aspx?data=recipientInfoRelationship&DUNS=785319963;>  
[http://docquery.fec.gov/pres/2012/M8/C00431445/A\\_EMPLOYER\\_C00431445.html](http://docquery.fec.gov/pres/2012/M8/C00431445/A_EMPLOYER_C00431445.html) and  
[http://www.myfloridacfo.com/aadir/docs/FY13-14%20Transparency%20Report%20FINAL%20\(7-23-14\).pdf](http://www.myfloridacfo.com/aadir/docs/FY13-14%20Transparency%20Report%20FINAL%20(7-23-14).pdf).



Tay Terror Attack]; FL. Stat. 163.502 (Safe Neighborhoods Act), 42 USC § 9902(2) (Poverty Line), 47 USC § 396(a) (Corporations for Public Broadcasting), 47 USC § 394 (Establishment of National Endowment) and share United States currency in Financial Institutions (18 USC § 20) in depository institutions pursuant to 12 USC § 1813(c)(1) through its shareholders, constituencies, organizations, agencies, municipalities, education and financial institutions pursuant to 12 USC § 2903 and or 15 USC § 6809(3)(A) and or 31 USC § 5312, and any other relationships or fiduciary relationships as mentioned herein and that can be proven at trial.

97. The Defendants are herein identified as white supremacist, black separatist<sup>9</sup> and or a hate group<sup>10</sup> such as the KKK<sup>11</sup>, secret organizations such as the illuminati<sup>12</sup>, and black separatist like the Black Panther Party with individuals, groups, organizations, business corporations and public officials of **ANY AND ALL** race, color, creed, religion, sexual orientation, region and cultures including hispanic and citizens from and or with ancestry from the U.S. and Foreign Countries. Majority of Defendants are white and or Caucasian and are the persons responsible for the Tay Tay Terror Attack and Tay's livelihood on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

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<sup>9</sup> Black separatists typically oppose integration and racial intermarriage, and they want separate institutions — or even a separate nation — for black people in America. Most contemporary forms of black separatism are strongly anti-white and anti-Semitic, and a number of religious versions assert that blacks — not Jews — are the Biblical "chosen people" of God.

Although the Southern Poverty Law Center recognizes that much black racism in America is, at least in part, a response to centuries of white racism, it believes racism must be exposed in all its forms. White groups espousing beliefs similar to black separatists would be considered clearly racist. The same criterion should be applied to all groups regardless of their color. See <http://www.splcenter.org/what-we-do/hate-and-extremism>.

<sup>10</sup> All hate groups have beliefs or practices that attack or malign an entire class of people, typically for their immutable characteristics. Hate group activities can include criminal acts, marches, rallies, speeches, meetings, leafleting or publishing.

<sup>11</sup> See <http://newsone.com/2455329/kkk-florida/>.

<sup>12</sup> See <http://christianity.about.com/od/endtimestopicalstudy/a/JZ-Illuminati-Conspiracy.htm>.



### DEFENDANTS OATH

98. The *oath of office* of the *President of the United States* (Obama) is an *oath* or *affirmation* required by the *United States Constitution* before the President begins the execution of the office. The wording is specified in *Article 2, Section 1, Clause 8* in the United States Constitution.

99. The United States legislature took the Oath's or affirmations pursuant to 4 USC § 101.

100. Defendants and or RICO Defendants are under the Oath pursuant to Art § Section 5(b), FL. Const. and... "so help me God" as stated in § 92.52 FL. Stat. to perform the duty to protect Tay and give him the opportunity to obtain his Self Made<sup>13</sup> American Dream<sup>14</sup> on, before and after March 5, 2009 pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack. (hereinafter, "Oath<sup>15</sup>")

### OMNIBUS CLAUSE

101. "The Omnibus Clause of §1505 was broadly stated in order to cover the many possible ways in which the due administration of justice could be corruptly obstructed. See *United*

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<sup>13</sup> "Self Made" is a term that's deeply rooted in the "American Dream" for every person, especially a Black Man. From *Fredrick Douglas'* concept of *Self Made Men*; Self-made men [...] are the men who owe little or nothing to birth, relationship, friendly surroundings; to wealth inherited or to early approved means of education; who are what they are, without the aid of any of the favoring conditions by which other men usually rise in the world and achieve great results. (pp549-50) Also used as a album title by Warner Bros. Maybach Music Group and Rozay (*Self Made* (2011) & *Self Made 2* (2012)). In sum is a person who was born poor, but who achieved great economic or moral success thanks to their own hard work and ingenuity rather than to any inherited monies or assets, family connections or other privilege.

<sup>14</sup> In the definition of the American Dream by James Truslow Adams in 1931, "life should be better and richer and fuller for everyone, with opportunity for each according to ability or achievement" regardless of social class or circumstances of birth. See Library of Congress. American Memory. "What is the American Dream?", lesson plan. The idea of the American Dream is rooted in the United States Declaration of Independence which proclaims that "all men are created equal" and that they are "endowed by their Creator with certain inalienable Rights" including "Life, Liberty and the pursuit of Happiness." See Kamp, David (April 2009). "Rethinking the American Dream". *Vanity Fair*. Archived from the original on May 30, 2009. Retrieved June 20, 2009.

<sup>15</sup> Hereinafter means any and all affirmations by Tay any and or all Defendants.





*States v. Partin*, 552 F. 2d. 621, 631 (5 Cir.), cert denied, 434 U.S. 903, 98 S. Ct. 298, 54 L. Ed. 2d 189 (1977). The fact that a defendant devises an original method of achieving that aim does not insulate him from prosecution.”

102. By virtue of the omnibus clause, many courts have held that it is possible to obstruct justice under [1505, 1515(3), and 1518] by means similar to, but different from those specifically enumerated in the first part of the provision. *United States v. Saget* 991 F. 2d. 702, 713 (11 Cir.), cert. denied, 510 U.S. 950 (1993); *United States v. Neal*, 951 F. 2d 630, 632 (5 Cir. 1992); *United States v. Rasheed*, 663 F. 2d 843, 850-52 (9 Cir. 1981), cert. denied, sub norm. *Phillips v. United States*, 454 U.S. 1157 (1982). A party may be prosecuted under section [1505, 1515(3), and 1518] for endeavoring to obstruct justice, *United States v. Edwards*, 36 F. 3d 639, 645 (7 Cir. 1994); *United States v. Bucey*, 876 F. 2d 1297, (9 Cir.) cert denied, 493 U.S. 1004 (1989); *United States v. Brinkberry*, 744 F. 2d. 580 (7 Cir. 1984), cert denied, 481 U.S. 1039 (1987).

103. Defendants and or RICO Defendants knowingly and intentionally undertook an action “from which an obstruction of justice was a reasonably foreseeable result” *United States v. Thomas* 916 F. 2d 647, 651 (11 Cir. 1990) see also *United States v. Saget*, 991 F. 2d 7072, 713 (11 Cir.).” Defendants and or RICO Defendants who intentionally under takes an act or attempts to effectuate an agreement the reasonably foreseeable consequence of which is to obstruct justice, violates 18 USC Section 1505, 1515(3) and 1518 even if his hope is that the judicial machinery will not be impaired. Cert. denied 441 US 693 (1979); *Knight v. U.S.*, 310 F. 2d 305 (5 Cir. 1962). (Specific intent must be to do some act or acts which will tend to impede the due administration of justice) *United States v. Neil* 951 F. 2d 630 (5 Cir. 1992).



104. Defendants and or RICO Defendants “knew their action was likely to affect the judicial proceeding,” or there would be no reason or incentive for the Defendants to conspire to conceal, hide or make unavailable, or endeavor to conceal, hide, or make unavailable Tay’s evidence. (*Aguillar*, 515 US at 599, 115 S. Ct. 2357. Wherefore the Defendants and or RICO Defendants acted with requisite knowledge and corrupt purpose to violate Title 18 § 1505, 1515(3) and 1518. “[It is not necessary that the Defendants succeed in obstructing justice only that they endeavored to do so, or in a manner that is likely to do so.]” *Aguilar* 515 US at 601-02, 115 S. Ct. 2357, *United States v. Breason*, 104 F. 3d 1267, 1284 (11 Cir. 1997); *US v. Aragon*, 983 F. 2d. 1306, 1315 (4 Cir. 1993).

105. Title 18 USC § 371, makes criminal any scheme, or artifice facilitating the willful impairment of a legitimate government function” in any manor for any purpose” “thus if the Defendants and others have engaged in dishonest practices in connection with a program administered by an agency of the Federal Government, it constitutes fraud on the United States, under § 371 “Defendants activities to hide, conceal, make available or destroy documents, has impeded or interfered with a legitimate government function. Case law relating to § 1001 defines “defrauding the United States as doing any act which decreases it effectiveness, causing the agency to wrongfully act, or not act, on such writings or acts, or decrease the public confidence in government offices.”

106. The Supreme Court has construed § 371 as reaching “any conspiracy for the purpose of impairing, obstructing, or defeating the lawful function of any department of government.” *Dennis v. United States*, 384 US. 855, 861, 86 S. Ct. 1840, 1844, 16 L. Ed. 2d. 973 (1966). The Court has explained the types of fraud are contemplated by the statute:

“To conspire to defraud the United States means primarily to cheat the government out of property, money, but it also means to interfere with or obstruct one of



its lawful Government functions by deceit, craft, or trickery, or at least by means that are dishonest. It is not necessary that the government shall be subjected to property or pecuniary loss by fraud, but only that its legitimate official action and purpose shall be defeated by misrepresentation, or overreaching of those charged with caring out the government intention.” *Hammerschmidt v. United States*, 265 U.S. 182, 188, 44 S. Ct. 511, 512, 68 L. Ed. 968 (1924).

107. “Conspiracy” becomes a crime for sooner than “attempt”. Mere acts of preparation will satisfy the most demanding conspiracy statute, not so with attempt. Conspiracy requires no more than an overt act in furtherance.” *United States v. DeMarce* 564 F. 3d 989, (8 Cir. 2009); *United States v. Iribe*, 564 F. 3d at 1160.

### **STANDING**

108. After Tay ran for Mayor of Cocoa in 2008 with a visual innovative plan in the implementation of education, employment, entrepreneurship and voting rights in Brevard County, Tay paid about \$146.25 for an Equal Employment Opportunity to become a substitute teacher based on and including a deceptive and falsified drug test. The RICO Defendants kept or caused to be kept Tay’s lawful money, and lawful results of a true and accurate drug test through the Florida Chain of Custody form, and converted said money to public use violating Tay’s rights under the 14<sup>th</sup> Amendment of the U.S. Constitution. That is, liberty and property rights guaranteed. Money is property and liberty is how and when Tay chose to use it. Tay has also suffered deprivational rights under Article VII Amendment 1 when Defendants did corruptly, influence, obstruct or impede, or endeavored to influence, obstruct or impede the due administration of justice in a Federal Court, Middle District of Florida – Orlando Division by concealment, by alteration or destruction of documents or endeavoring to conceal, alter or destroy documents, together with effectuating an arrangement, or endeavoring to effectuate and arrangement, in any manor for any purpose, of which the reasonably foreseeable consequences would be to obstruct or impede the due



administration of justice. All done knowingly and intentionally by defendants in a manner exhibiting wanton and willful disregard of Human, Economic and other rights or property. All in violation of Defendants Crimes and any and all other herein incorporated laws and statutes. Where Defendants were and still are the direct and proximate cause of all damages. In February and March 2009 the Defendants were negligent, prejudicial and discriminatory for the reasons stated above with substitute teacher application procedure, medical examiners, Neil Dash, the School Board and the State's sign off, no distinctive evidence of Tay's Image and Likeness and Property ever failing a drug test on February 23 and or allegedly on February 24, 2009 and intentionally negligent record keeping on, before and after February 9, 2009. The U.S. Constitution, Federal Law, and Tay's rights thereunder. All in violation of Title 18 USC 242 (Deprivation of Rights under Color of Law), Title 18 USC § 1341 (Frauds and Swindles), Title 18 USC § 1346 (Definition of scheme or artifice to defraud) and Title 18 USC § 1028 (Fraud and related activities in connection with identification documents, authentication features and information). Acting under Color of Law has been shown. Defendants continue to violate Tay's liberty, property, 14<sup>th</sup> Amendment, Article VII Amendment I rights, Substantive Due Process and Equal Rights under the U.S. Constitution. Article VII Amendment V provides... **nor be deprived of life, liberty, or property without due process of law; nor shall private property be taken for public use, without just compensation.** Wherefore Tay has a claim of right to his time, money, energy, privacy, religion and property. Defendants willfully and knowingly violating federal law at Tay's expense.

109. Concerted actions are illegal when a reasonable person would have known or had reason to know some illegal activity despite not having direct knowledge. As a result, the



Defendants and or RICO Defendants deliberately blinded themselves to the illegal activity by not questioning or looking into the facts surrounding the activity. *Willful Blindness* instruction is to prevent a person from claiming innocence when they themselves did not act in a responsible manner to avoid a criminal conduct, and thereby the law will not reward a defendant who is not totally innocent person (*or deliberately blinded themselves*) and deprive them of a defense, *lack of knowledge*, mistake, or intent (no longer a valid defense). All in violation of Title 18 USC §371 (*The Federal Conspiracy Law*).

110. The above Federal Violations satisfy the overt acts requirement for §371, and § 1349 (Attempt and Conspiracy), and § 1621(2) (Perjury Generally). In furtherance of conspiracy, Defendants all continue with the same “concerted action”, that is, to do nothing. All in violation of Tay’s rights guaranteed under the U.S. Constitution.

111. “A complaint will not be dismissed for failure to state a claim, even though inartistically drawn and lacking in allegations of essential facts, it cannot be said that under no circumstances will the party be able to recover.” *John Edward Crockard v. Publishers, Saturday Evening Post Magazine of Philadelphia, PA* (1956) Fr Serv 29, 19 F.R.D. 511, DCED Pa 19 (1958).

112. A complaint should not be dismissed for failure to state a claim unless it appears beyond doubt that plaintiff can prove no set of facts that would entitle him to relief. *Conley v. Gibson*, 355 U.S. 41, 45-46, 78 S.Ct. 99, 101-102, 2 L.Ed.2d 80 (1957); *Luckey v. Harris*, 860 F.2d 1012, 1016 (11th Cir.1988), *reh’g denied en banc*, 896 F.2d 479 (11th Cir.1989), *cert. denied*, 495 U.S. 957, 110 S.Ct. 2562, 109 L.Ed.2d 744 (1990).

113. “...whether an issue is frivolous turns on the existence of a factual and legal basis, of constitutional dimension, for the asserted wrong, however inartfully pleaded.” *Id.* (quoting



*Sun v. Forrester*, 939 F. 2d 924, 925 (11<sup>th</sup> Cir. 1991). Pursuant to FRCP Rule 61...“at every stage of the proceeding, the court must disregard all errors and defects that do not effect [plaintiff’s]...substantial rights.

114. Tay has standing to bring for this litigation pursuant to the Re-Examination Clause of the 7<sup>th</sup> Amendment, Fed. R. of Evidence Rule 102, Rule 104(b), 401(a)(b), and Rule 902(8)(11), FL. Stat. 90.402 (Admissibility of Evidence), Fed. R. Civ. P. Rule 60(b) “mistake”, “inadvertence”, “surprise” and or “excusable neglect”; (2) newly discovered evidence that, with reasonable diligence, could not have been discovered in time to move for a new trial under Rule 59(b); (3) fraud (whether previously called intrinsic or extrinsic), misrepresentation, or misconduct by an opposing party; (4) the judgment is void; and (6) any other reason that justifies relief.

115. Tay’s character was defamed, slandered and offended by a series of events by public officials and therefore has standing to bring suit. Pursuant to *Rosenfeld v. New Jersey*, 408 U.S. 901, 906, 92 S.Ct. 2479, 2481, 33 L.Ed.2d 321 (1972). As stated therein:

'(A) verbal assault on an unwilling audience (or an individual) may be so grossly offensive and emotionally disturbing as to be the proper subject of criminal proscription, whether under a statute denominating it disorderly conduct, or, more accurately, a public nuisance.'

116. Tay bears the burden of proof and must prove the allegations by a preponderance of the evidence to prevail. In a forced labor scheme case based solely on urinalysis test results and events thereafter, a *prima facie* case of the use of a dangerous drug is made when the following three elements are established: 1) the respondent was the person who was tested for dangerous drugs; 2) the respondent failed the drug test; and 3) the test was conducted in accordance with 46 C.F.R. Part 16.2 [hereinafter, Fl. Stat. 112.0455] Appeal Decision 2603 (HACKSTAFF) (1998). See also Appeal Decision 2653 (ZERINGUE) (2002).



117. *Mens rea* in criminal law is concerned with the state of mind of the defendant. *Actus Reus* is the term for the "guilty act" when proved beyond a reasonable doubt in combination with the *mens rea*, "guilty mind", produces criminal liability. Most true crimes will require proof of *mens rea*. Where *mens rea* is not required the offence is one of strict liability. There are three main levels of *mens rea*: **intention**, recklessness and negligence. **Intention** requires the highest degree of fault of all the levels of *mens rea*. A person who intends to commit a crime, can generally be said to be more culpable than one who acts recklessly<sup>16</sup>.
118. Direct intent can be said to exist where the defendant embarks on a course of conduct to bring about a result which in fact occurs. The Defendants *mens rea* within the Tay Tay Terror Attack and Tay Tay Terror Attack were intentional, reckless and negligent as described herein. Tay has standing to bring a *mens rea* – *actus reus* criminal claim based upon the March 5, 2009 Document and other actions within the Tay Tay Terror Attack including but not limited to: March 5, 2009, February 2, 2010, March 5, 2010, March 24, 2010, April 1, 2010, March 5, 2012, and May 15, 2012.
119. Tay is the respondent who was tested for dangerous drugs, as well as marijuana which is not dangerous<sup>17</sup>. Tay allegedly failed the drug test and the drug test was in accordance to Fl. Stat. 112. 0455. Tay satisfies the burden of proof elements to make a *prima facie* case of use of a negligent, fraudulent and deceptive official writing for Tay to rely on for his pursuit of happiness.
120. In order for Tay to make out a *prima facie* case or a race based equal protection claim, the Plaintiff [Tay] must show that: (1) he belongs to a protected class; (2) he was qualified to do the job; (3) he was subjected to adverse employment action; and (4) his employer treated

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<sup>16</sup> <http://www.e-lawresources.co.uk/Mens-rea-reckless.php>

<sup>17</sup> See <http://www.mpp.org/assets/pdfs/library/GatewayDebunked.pdf>.



similarly situated employees outside of his class more favorably. *Crawford v. Carroll*, 529 F.3d 961 (11<sup>th</sup> Cir. 2008). Tay is a member of a protected class as mentioned herein or above and was qualified to be a substitute teacher in and for the State and were subjected to adverse employment action on March 5, 2009 through the March 5, 2009 Document from the School Board and the State. The School Board and the State allowed and or allows Caucasian applicants to test positive for marijuana or any other illegal or over the counter drug and receive drug habilitation through the School Board and the State's rehab program to accept their employment application as a full time teacher or substitute teacher as mentioned herein.

121. In order to establish a *prima facie* case of employment discrimination<sup>18</sup>, courts will generally require proof that: The plaintiff is a member of a "protected group"; The plaintiff was qualified in all respects for the job they sought; The plaintiff was rejected in spite of being fully qualified; After the rejection, the employer continued seeking for applicants with the plaintiff's qualifications. Tay was a member of a protected group, and qualified in all respects for the substitute teacher job he sought, and was rejected in spite of being fully qualified, and after the rejection the School Board continued seeking applicants with Tay's qualifications.

122. Tay has standing to bring suit as a slave trafficking victim as defined in 18 USC § 1581-§1584 pursuant to 18 USC § 1589(a)(4) through a forced scheme as defined herein.

123. In order to establish a *prima facie* case of retaliation<sup>19</sup> under this statute, a plaintiff must show (1) that he engaged in protected activity; (2) an adverse employment action; and (3) a causal connection between the activity and the adverse action.

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<sup>18</sup> <http://www.legalmatch.com/law-library/article/employment-discrimination.html>

<sup>19</sup> *Thompson v. Potomac Elec. Power Co.*, 312 F.3d 645, 650 (4th Cir.2002); *Anderson v. G.D.C., Inc.*, 281 F.3d 452, 458 (4th Cir.2002). The Fourth Circuit has expansively interpreted what constitutes protected activity under the statute's participation clause, indicating that "the provision is meant to sweep





124. To prove a claim of negligence, the plaintiff must show four things, called the prima facie case for negligence: 1. Duty—a statement of the facts that establishes the legal relationship between the plaintiff and defendant. 2. Breach of the duty to the plaintiff—a statement of facts that illustrate that the defendant breached a legal duty owed the patient. In medical malpractice, this means that the defendant provided medical care that fell below the legally required standard. 3. Causation—that the breach of the defendant's duty caused the plaintiff's injuries. 4. Damages—the monetary value of the plaintiff's injuries.

## **CLAIM FOR RELIEF**

### **FACTS**

#### **A. Defendants Nefarious Scheme**

125. The Defendants and or RICO Defendants has a duty to promote honesty and fair dealing in the interest of consumers pursuant to 21 USC § 341. The Defendants and or RICO Defendants breached those duties through the Tay Tay Terror Attack; Tay Tay Terror Attack.

126. Defendants and or RICO Defendants used the United States Postal Service ("USPS"), the internet and television with Viacom, Time Warner and or Comcast or other cable stations as the carrier, and devices such as email, fax, printers, computers, mail scanners, gas chromatography/mass spectrometry tests (drug test), cell phones, computer applications, credit card and mail delivery scanners, voting booths, library and student identification cards, food stamp card (SNAP benefit card), remote controls, data marketing including but not limited to computer IP addresses, cable wires, and forms of wires and or devices [hereinafter,

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broadly." *Glover v. South Carolina Law Enforcement Div.*, 170 F.3d 411, 414 (4th Cir.1999) (citing *Merritt v. Dillard Paper Co.*, 120 F.3d 1181, 1186 (11th Cir.1997)). **To qualify as an "adverse employment action," the employer must have engaged in activity adversely affecting the "terms, conditions, or benefits of employment."** *Von Gunten v. Maryland*, 243 F.3d 858, 866 (4th Cir.2001)



“Defendants Devices”, “Tay Tay Terror Attack Surveillance”], and executed the Tay Tay Terror Attack.

127. In order to attend college, as a high school senior Tay was forced to pass the FCAT pursuant to FL. Stat. 232.246(K)(5)(e)(2) and School Board policy which require a 2.0 gpa on 24 credits to meet graduation requirements; the Defendants enticed, induced, coerced and targeted Tay with the advertising and marketing of public and private loans (20 USC § 1019 – Definitions) by the United States pursuant to 20 USC § 1087-2 (Student Loan Marketing Association), 20 USC § 1070 (Statement of Purpose; program authorization), 20 USC § 1071 and 1019d (Self Certification form for Private Loans). The USDOE, School Board and State forced Tay to be eligible, apply and receive private and public loans by signing agreements of promissory payback of the amount borrowed (“Education Contracts”) pursuant to 20 USC § 1077 (Eligibility of Student Borrowers and terms of federally insured student loans) and 20 USC § 1087dd (Terms of Loans) for financial assistance to attend college. The Defendants knew and or should have known that Tay would accumulate severe amounts of debt due to his demonstration of need and eligibility pursuant to 20 USC § 1087ii – (a) Low Income Communities.

128. The United States and or State authenticated the appropriations for the RICO Defendants pursuant to 21 USC § 1524 (“Authorization of Appropriations”) to profit from the Tay Tay Terror Attack with including but not limited to the contributions to 501(c) organizations or companies, State sales tax<sup>20</sup> and or use tax, Municipal Public Service Tax (MPST), fuel tax, property taxes, trusts, bonds, stocks, capital and capital stock pursuant to 12 USC § 51c (“Common Stock, capital and capital stock”), therefore those stockholders, executors,

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<sup>20</sup> Including community service tax, corporate income tax, motor and other fuel tax, dry cleaning tax, estate tax, gross receipts tax, insurance premium tax, and severance tax. See <https://revenue.law.state.fl.us/Pages/Home.aspx>



administrators, guardians, or trustees pursuant to 12 USC § 66 (“Personal liability of representatives of stockholders”) under the Oath and definition pursuant to 12 USC § 73 (Oath) and 12 USC § 221 (“Federal Reserve System”) are State Actors under the Pinkerton Rule pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack.

**A. Tay’s run for Mayor of Cocoa**

129. In April of 2008, Tay graduated from Florida A&M University with a degree, aspiring to return home to enrich and stimulate his environment spiritually, mentally, professionally and financially through his dedication to public service before February 9, 2009.

130. Tay qualified as a candidate for Mayor of Cocoa in 2008 between Tuesday, August 5, 2008 Noon, to Tuesday, August 19, 2009 Noon pursuant to the following: a. File “appointment of campaign treasurer and designation of Campaign depository form with the Cocoa Clerk; b. Open a campaign account with a deposit of at least \$141 for Mayor; c. Pay Qualifying Fee plus Election Assessment to the Cocoa Clerk (\$141); d. review candidate packages of information with Cocoa Clerk with a question/answer session as needed. Sign various forms and oath of candidacy as required by City Charter and State law; e. Provide current identifications and voter registration documentation. Tay followed and completed the Cocoa Municipal Ordinances for Mayor including but not limited to 2-27 Candidates Oath; 2-27.5 (Council to pass on qualified candidates); 2-26 (Qualifying Fees); 2-25 (Qualifying Period) and featured in Brevard County’s Christian Coalition 2008 Voter’s guide.

- a. During Tay’s campaign for Mayor of Cocoa, FOCUS Solutions Limited, Inc. were Tay’s only endorsement to make history as Cocoa’s Youngest and Youngest African American male Mayor candidate and or Mayor elect; Central Florida’s Youngest African American Mayor Candidate and or Mayor elect; Florida’s 1<sup>st</sup> or 2<sup>nd</sup> Youngest



African American Mayor elect and with education from FAMU under 25 years old without any family background of a legal corporate structure as a CEO, author and politicians (*Florida BO\$\$ Class*).

131. The State required an appointment of a campaign treasurer pursuant to Fl. Stat. 106.021(1) as received by Cocoa clerk on July 25, 2008. Tay was appointed campaign treasurer for Tay's campaign for Mayor of Cocoa, and submitted to Cocoa and Florida Department of State campaign treasurer reports for the State Division of Elections thereafter.
132. While a candidate for Mayor, the Coastal Florida Police Benevolent Association and Coastal Florida Public Employees Association held a candidate screening on September 22, 2008 at the Holiday Inn Express in Cocoa, his screeners were all white males. Officers and employees on behalf of them inserted information into computer database to collude in denying Tay an endorsement from them, knowing Tay's scheme and plan to upgrade Cocoa by and through this screening and a questionnaire that was provided to him in which he submitted to them through email with smith4cocoamayor@live.com.
133. During his 2008 electoral campaign to be the City of Cocoa's next Mayor, he submitted an email of gratitude to some of the defendant's employees (administrators and teachers that he knew and didn't know) simply thanking them for what they have taught and embedded in him as a product of the Brevard County education system, and showing his appreciation as a former student and at the time, a Mayor candidate whose #1 initiative is Education.
134. During this election, Tay and Mike Blake were opponents and had to debate against each other occasionally. This election stirred chaos in the community because it was looked upon a "black man versus a black man to allow a white man to win." Mike Blake realized that Tay was very serious about replacing him as Mayor when he was quoted in saying that "he wasn't



taking [Tay] lightly” and that he had an “advantage because of his record as councilman and Mayor.”

135. Tay took his campaign serious, and because his company FOCUS Solutions Limited was his only endorsement with limited fund<sup>21</sup>s, he relied on social media to promote his run for Mayor and to make himself accessible to citizens by supplying the Brevard County Elections a website, a P.O. Box, and email. Mr. Blake and the other opponent did not.

136. Tay was acknowledged in a published document by the Brevard County Christian Coalition on a questionnaire for Brevard County candidates on important issues within Brevard County. Mike Blake and Dave Golding did not answer questions considering religion and politics.

137. On Thursday, October 2, 2008 at or on about 1:41 PM before Tay even began his endeavor to become a Brevard County School substitute teacher, during his 2008 electoral campaign to be the City of Cocoa’s next Mayor he submitted an email of gratitude to some of the School Board’s employees (administrators and teachers that he knew and didn’t know) simply thanking them for what they have taught and embedded in him as a product of the Brevard County Education System, and showing his appreciation as a former student and at the time, a Mayor candidate whose #1 initiative is Education, one of them being to Mark Mullins (Clearlake Middle School Principle). Due to Florida's broad public records law, most written communications to or from government employees regarding public education are public records. Therefore, e-mail communication may be subject to public disclosure and is in the computer network and records of the School Board of Brevard County.

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<sup>21</sup> Tay received no financial, moral and or encouraging support from family members, other private individuals and or businesses. Defendants aggressively and discouragingly told Tay that he shouldn’t run for Mayor of Cocoa because he had no experience and attempted to deter him with other job opportunities that Tay had no interest in or had no transportation to get to.



138. Tay contacted Defendants enlightening them on the history he was trying to obtain through the Love and Service of his Name and Likeness and seeking endorsements or sponsorships. Defendants may and or may not have responded to Tay, and did not sponsor and or endorse Tay to run for Mayor of Cocoa.

139. As a 2008 Mayor Candidate and Cocoa Exclusive Name and Likeness Tay knew that there were very few black male full time and no black male substitute teachers in Brevard County and decided to become a substitute while embarking as a “exclusive public figure” on his entrepreneurial journey.<sup>22</sup>

140. After a Florida Today Article with Tay and the other Cocoa Mayor Candidates were on the front page of a particular section, Tay was asked by McNair Magnet School Principal, Rosette Brown, “you aint quit yet?” in a distasteful manner while attending a McNair basketball game to deter Tay from running against Michael Blake (another black man, NPHC member, School Board employee, Dick Blake’s son).

141. Tay’s presence was needed as he was the motivational speaker for Beth Scarborough’s class on behalf of Mrs. Smith<sup>23</sup> [Rockledge High School] for a Motivational Day orchestrated by Rockledge High employee, Mrs. Smith sometime between November and January while working at Books A Million.

142. McDonald’s in Cocoa and or Brevard did not celebrate Tay’s ambition and accomplishments as a 365.com definitive Name and Likeness for the motto “Deeply Rooted In the Community 365 Days a Year” and or companies such as Space Coast Business

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<sup>22</sup>See Teacher Demographics in Florida’s Public Schools, *Fall 2009. The racial profile of Florida’s public school teachers is shown in Figure 1. In the 2009-10 school year, Florida had 167,607 teachers. See Table(s) 10 and 11.*

<sup>23</sup> Who contacted Tay by email to either of his Hotmail addresses to notify him of his selection to motivate students of the School Board and State.



Marketing did not celebrate Tay as the Future of Florida's Space Coast during and or after the candidacy for Mayor of Cocoa. Defendants knew and should've known Cocoa's, Brevard's and the State's political candidates and campaigns background because of the policies, ordinances and legislation passed by State and United States officials.

143. Defendants and or RICO Defendants, their affiliations and those on behalf of them met and discussed a nefarious plan [Tay Tay Terror Attack] to not allow Tay to enjoy his life because they felt Tay would make an immediate impact on Cocoa and in and for Brevard and the State. This plan included mentally enslaving Cocoa citizens to not elect Tay as Mayor because he is a Christian – Rastafari, black, African American male under 25, with education from FAMU residing in Cocoa's Diamond Square District from a low income single family household with no official experience in public municipality positions on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

144. After successfully, yet not being elected Mayor, he worked for the holiday season at Jos. A. Bank and Books A Million in Viera, FL from approximately November 10<sup>th</sup>, 2008 to around the date of January 10, 2009 to help him fund his next entrepreneurial investment for being a educator in Brevard County and corporate mogul in the U.S. and Foreign Countries especially the United States.

*1. MSN Hotmail Scheme*

145. MSN Hotmail partners with and is a client of TRUSTe solutions for consumer privacy and protection, which include privacy by design consulting, privacy certifications, website monitoring tools, and preference management platforms ensure companies can safely use data across all their digital business channels, including websites, mobile applications, cloud services, social networks, email, and advertising.



146. Symantec is a licensee of the TRUSTe Privacy Program. TRUSTe is an independent initiative whose mission is to build users' trust and confidence in the Internet by promoting the principles of disclosure and informed consent.
147. (Hereinafter, Microsoft, Symantec and TRUSTe are jointly referred to as "Web Security Partner Program")
148. Tay had an email account with Hotmail Email Account as flanative\_03@hotmail.com, and also has an Hotmail Email Account as smith4cocoamayor@live.com (Microsoft) and had trust and confidence under the privacy protection of the Microsoft Online Privacy Statement and their membership with the TRUSTe privacy seal program ("Web Security Partner Program") that his personal information and emails would be safe and protected.
149. Tay's Hotmail Email Accounts mailboxes of received, sent, deleted and or drafted consisted of his trade secrets pursuant to 18 USC § 1839(3). [hereinafter, "trade secrets" and or "Tay's Exclusive Name and Likeness and Property"]
150. Tay detrimentally relied on his Hotmail Email Accounts to harbor trade secrets for his social, religion, government food stamp certification, education, litigation and business activities, and evidentiary proof of documents and contact with local, state and federal officials and agencies, celebrities and prominent corporations for employment, and a successful litigation in the Middle District – Orlando Division; as well as information regarding his Florida corporation structure.
151. Tay was the victim of a phishing scam by RICO Defendants, and this is how it happened<sup>24</sup>:
- a. A consumer [Tay] receives an e-mail which appears to originate from a financial institution, government agency, or other well-known/reputable entity.



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<sup>24</sup> <http://www.fdic.gov/consumers/consumer/alerts/phishing.html>



- b. The message describes an urgent reason you must "verify" or "re-submit" personal or confidential information by clicking on a link embedded in the message.
- c. The provided link appears to be the Web site of the financial institution, government agency or other well-known/reputable entity, but in "phishing" scams, the Web site belongs to the fraudster/scammer.
- d. Once inside the fraudulent Web site, the consumer may be asked to provide Social Security numbers, account numbers, passwords or other information used to identify the consumer, such as the maiden name of the consumer's mother or the consumer's place of birth.
- e. When the consumer provides the information, those perpetrating the fraud can begin to access consumer accounts or assume the person's identity.

152. Tay attempted to login into his email account ("flanative\_03@hotmail.com ") through MSN Hotmail and was notified that his email has been blocked due to someone else having access to his account and using it without his knowledge to send spam.

153. Tay created another email address ("flanative\_cocoa321@hotmail.com") to refer breach issues to MSN Help Center. Tay contacted MSN Help Center and they only replied once with Notice of request and said that they will contact Tay in 24 hours on July 10, 2012. They did not contact Tay within 24 hours, so Tay contacted them on July 14, 2012, again with no reply. Tay created another email account with hotmail due to their inducement of deceptive advertising of serious security.

154. Tay attempted to retrieve his flanative\_03@hotmail.com once more. On July 29, 2012 Web Security Partner Program confirmed reception of Tay's account recovery request with issue #45713876.



155. On August 3, 2012 the Web Security Partner Program were unable to verify Tay's ownership of the account with the information he provided and stated they were committed to protecting Tay's personal information with "serious security."
156. On August 4, 2012 the Web Security Partner Program confirmed reception of Tay's account retrieval with another issue #47105269.
157. On August 12, 2012 Tay received a service request update #1182011404.
158. On August 14, 2012 Tay received a final update on his account recovery request as Microsoft were unable to verify Tay's ownership using information that he provided and were told to create another email account MSN Hotmail through the Web Security Partner Program as he had already created flanative\_cocoa321@hotmail.com.
159. On September 18, 2012 at approximately 3:41 p.m., Microsoft sent Tay at flanative\_cocoa321@hotmail.com that his account has been retrieved and verified and listed options for him to change his password and update his security information. Tay clicked on the link and could not access the account due to the web server being down on numerous occasions.
160. Tay had filed a complaint with Internet Crime Complaint Center (IC3), and around January 13, 2013 IC3 confirmed successful submission of the complaint.<sup>25</sup>
161. The Web Security Partner Program compromised Tay's personal information and privacy to Email Phisher to use Tay's Exclusive Name and Likeness, steal his Property to spam the public and the Web Security Partner Program breached their duties of protection with extreme lack of care.

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<sup>25</sup> *IC3 Complaint: I1301141151092242*



162. This was an attempt to trick Tay into providing sensitive personal information such as social security number, credit card, banking other personal details to compromise his Exclusive Name and Likeness so that Tay can be retained as a Web Security Partner Program customer and permanently deprive Tay of his Property.

2. *NSA Scheme*

163. The Information Awareness Office (“IAO”) [“United States”] is a branch of the Department of Defense's Defense Advanced Research Projects Agency whose mission is to "imagine, develop, apply, integrate, demonstrate and transition information technologies, components and prototype, closed-loop, information systems that will counter asymmetric threats<sup>26</sup> by achieving total information awareness."

164. The United States (Edward Snowden) has admitted to providing information to the news media including The Guardian and The Washington Post [non-Defendant Co-Conspirators] about two highly classified NSA surveillance programs. The United States engaged in an unauthorized communication scheme of national defense information, Tay, Tay's Trade Secrets<sup>27</sup> and his Data Info, and willful communication of classified communications intelligence information. In violation of and pursuant to 18 USC § 641 (“Public money, property or records”), 18 USC § 793(a) (“Gathering, transmitting, or losing Defense information”), and 18 USC § 798 (“Disclosure of Classified Information”) [hereinafter, “Tay Tay Terror Attack”].

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<sup>26</sup> As part of the IAO's "Total Information Awareness" program, several new technologies are being researched. See [http://www.sourcewatch.org/index.php/Total\\_Information\\_Awareness#IAO\\_Research](http://www.sourcewatch.org/index.php/Total_Information_Awareness#IAO_Research)

<sup>27</sup> Including but not limited to his messages, contacts and communications within his electronic mail address at [dsmith@focussolutionslimited.com](mailto:dsmith@focussolutionslimited.com).



165. The United States Chief Justice John Roberts appoints FISA court (“secret court”) federal judges which are Republican, conservative, white male justices of the United States.
166. The PRISM program<sup>28</sup> collects a wide range of data from nine companies, including Google, facebook, MSN Hotmail, Yahoo!, Apple, Skype, YouTube, AOL Mail and paltalk.com (“Social Media Mafia”) although the details vary by provider with a cost of about \$20 million per year from about 2007 to the present. The slide (attached Exhibit) shows when each company joined the program, with Microsoft being the first, on Sept. 11, 2007, and Apple the most recent, in October 2012. The programme reportedly followed information from ISP servers in order to help identify any cases of terrorism [i.e. Tay Tay Talented 10 Taliban].
167. This collected data generally includes Tay’s email, chat, video, voice, photo, and stored data, file transfers, video conferencing, Notifications of target activity (login’s), Online Social Networking details and other personal Data Info of Tay.
168. The Tay Tay Terror Attack uses the United States XKeyscore project to intentionally rob, steal, kill and destroy Tay’s Exclusive Name and Likeness and Property so that Email Hacker can terrorize Tay [Tay Tay Terror Attack] because of Tay’s Exclusive Name and Likeness to profit off Tay’s Exclusive Image and Likeness and Property:

Further leaks or information (provided to Tay) have revealed an NSA project called XKeyscore that, with a few keystrokes from any computer and or Defendants Device’s, can give a data analyst access to nearly everything Tay does on the Internet – from chat sessions to email to browsing habits.

The Xkeyscore system requires an email [Tay’s Exclusive Name and Likeness and Property] because many behaviors online are completely anonymous and it is only via some sort of identifier — a username and domain — that the system can scour the database of collected Internet traffic and metadata.

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<sup>28</sup> The program is called PRISM, after the prisms used to split light, which is used to carry information on fiber-optic cables.



“XKeyscore is used as a part of NSA’s lawful foreign signals intelligence collection system”

See <http://techcrunch.com/2013/07/31/nsa-project-x-keyscore-collects-nearly-everything-you-do-on-the-internet/>

169. Tay did not give consent to the United States to retrieve and or store his Data Info, or

give consent to Search Engines such as Microsoft to sell or distribute his Data Info to the

United States or any other private organization such as the NSA without his consent for

profit, all to misidentify him as a E-Terrorist torturing him through and with deprivation as a

Hidden Slave.

170. The United States tracked Tay through his personal telecommunications including but not

limited to phone records, text, 2-way messaging and Nextel chirps. Tay’s communications

services and the United States have a network to retrieve those phone and messaging records.

171. On or around March 12, 2013 in a United States Senate hearing NSA Director, James

Clapper [“United States”] lied to United States Congress. Sen. Ron Wyden (D-Ore.) asked

United States, “Does the NSA collect any type of data at all on millions or hundreds of

millions of Americans?” Clapper replied, “No sir ... not wittingly.”

172. In an interview with NBC’s Andrea Mitchell<sup>29</sup>, Clapper was asked why he answered

Wyden the way he did. He replied: “I thought, though in retrospect, I was asked [a] ‘when

are you going to ... stop beating your wife’ kind of question, which is ... not answerable

necessarily by a simple yes or no. So I responded in what I thought was the most truthful, or

least untruthful, manner by saying, ‘No.’ ”

173. On June 18, 2013 Rand Paul accused Clapper of lying directly under Oath to Congress

[United States] which is a crime.

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<sup>29</sup> See <http://www.nbcumv.com/mediavillage/networks/nbcnews/pressreleases?pr=contents/press-releases/2013/06/09/nbcnewsexclusiv1370799482417.xml>



174. On June 21, 2013 Clapper [United States] wrote to United States Senate Intelligence Committee stating that “My response was clearly erroneous – for which I apologize for.”<sup>30</sup>
175. Through a top-secret program authorized by United States federal judges working under the Foreign Intelligence Surveillance Act (FISA), the United States intelligence community can gain access to the servers of nine internet companies<sup>31</sup> or some Search Engine Defendants for a wide range of digital data with Tay.

*a. Tay’s Personal Computer hacking or Interference*

176. Sometime on or around March 16, 2013 Tay was using his Compaq Presario to view free pornographic material due to his emotional, mental and sexual distress and sexual abuse from a Sham 2009 Litigation in the Middle District of Florida in which he clicked on a video link that hacked Tay’s laptop and blocked him from logging in for computer use. When Tay turns on his computer to login the screen turns white with a message from the FBI Cybercrime Division in connection with Microsoft stating that he has to pay \$300 through a Wal Mart or Walgreens Money Pak Card, or a Money Gram to the FBI Cybercrime Division to unlock his computer, or he’s the center of an investigation for potential arrest.
177. RICO Defendants devices log, record and store Tay’s locations based on latitude and longitude alongside a timestamp. [*Recording Your Moves*]. Defendant uses cell-tower triangulation to obtain Tay’s location. *Recording Your Moves*. Alternatively, Defendant may use global positioning system (GPS) data to obtain Tay and users’ location.

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<sup>30</sup> See [http://www.washingtonpost.com/world/national-security/misinformation-on-classified-nsa-programs-includes-statements-by-senior-us-officials/2013/06/30/7b5103a2-e028-11e2-b2d4-ea6d8f477a01\\_story.html](http://www.washingtonpost.com/world/national-security/misinformation-on-classified-nsa-programs-includes-statements-by-senior-us-officials/2013/06/30/7b5103a2-e028-11e2-b2d4-ea6d8f477a01_story.html)

<sup>31</sup> The seal of Special Source Operations, the NSA term for alliances with trusted U.S. companies.



178. RICO Defendants devices download Tay or the user location data to Tay or the user's computer when the mobile device synchronizes ("syncs") or shares data with the computer. The data is unencrypted on iPod's, mobile devices and or also on users' computers that sync with those iPod's, mobile devices and computers.

179. Tay did not provide any sort of informed consent to the tracking at issue in this case.

180. Defendants collect the location information covertly, surreptitiously and in violations of law.

181. Tay were harmed by RICO Defendants' accrual of personal location, movement and travel histories because his or their personal computer(s) were used in ways he or they did not approve, and because he or they were personally tracked just as if by a tracking device for which a court-ordered warrant would ordinarily be required.

182. The public [Tay] has an interest in being able to travel without being tracked, and without that unencrypted tracking information being synced with computers that are networked to the internet and are unsecured. The public [Tay's] interest would not be disserved, and indeed would be advanced, by entering injunctions against Defendant. See *eBay, Inc. v. MercExchange, LLC*, 547 U.S. 388 (2006).

183. RICO Defendant tracks Tay's locations on its own, separate, apart and in addition to the information it collects in conjunction with other businesses that develop applications for Defendants Devices. This action is not about the applications' collection of information on Tay and other users; rather, it is specifically in objection to RICO Defendants' own collection of Tay and user location information.

184. The accessibility of the unencrypted information collected by RICO Defendant places Tay and users at serious risk of privacy invasions, including stalking.



185. This message gave a description of Tay's computer device including but not limited to his I.P. address, his country, city, road runner internet access, his Windows XP (32 – bit) operating system, and user name. On, before, and after the March 5, 2009 Document these communications, contents and publications of Tay and intentionally targeted Tay portrayed and or misidentified Tay as a State education terrorist and or E-Terrorist as defined in 18 USC § 2331(5)(b)(i)(ii)<sup>32</sup> whose information, trade secrets, Data Info were sold and flowed through U.S. and Foreign Countries, adjacent islands and foreign continents including Africa, Asia & Pacific, Latin America & Caribbean, Canada and Europe aiding Email Hacker and those countries or individuals to terrorize Tay by financing the Tay Tay Terror Attack and the Tay Tay Terror Attack to harbor, provide material support to terrorist, using weapons of mass destruction causing severe emotional disturbance to Tay (as defined in 20 USC § 1401 “emotional disturbance”) pursuant to 18 USC § 2701 as thereto above in the Tay Tay Terror Attack.

186. FISA's “roving” electronic surveillance provision allows the Government to continue surveillance where the target of the surveillance switches from a facility (*e.g.*, a telephone) associated with one service provider (*e.g.*, a telephone company) to a different facility associated with a different provider<sup>33</sup>.

187. On, before and after February 9, 2009 the RICO Defendants used and or uses Section 215 of the PATRIOT Act<sup>34</sup> pursuant to 18 USC § 1037(a)(1) (“Email Fraud”), pursuant to 18

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<sup>32</sup> With the intent to influence and coerce a civilian population to mature, grow, get motivated and value their life and the lives around them by following his Heavenly Father and God's orders and 10 Commandments.

<sup>33</sup> This provision, now codified at 50 U.S.C. § 1805(c)(2)(B), was enacted in the USA PATRIOT Act to correspond to roving authority that has applied to law-enforcement surveillance since 1986. *See* 18 U.S.C. § 2518(11).

<sup>34</sup> Section 215 allows for secret court orders to collect “tangible things” that could be relevant to a government investigation – a far lower threshold and more expansive reach than a warrant based on





USC § 2511(1) (“Interception and disclosure of wire, oral and electronic communications prohibited”) and or § 2516(1)(t) (“Authority for interception of wire, oral or electronic communications”) and or 47 USC § 397 (“Definitions”) and 18 USC § 2703 (“Required Disclosure of customer communications or records”) in violation of 18 USC § 2518 (“Procedures for Interception of wire, oral and electronic communications”) within the herein Tay Tay Terror Attack pursuant to the March 5, 2009 Document to support the “sensitive collection program” (Tay Tay Terror Attack) that has or may have targeted Tay’s Exclusive Image and Likeness, Name and Likeness and Property within the Tay Tay Terror Attack as an E-Terrorist to the RICO Defendants culture.

188. The Defendants and or RICO Defendants has a duty to promote honesty and fair dealing in the interest of consumers pursuant to 21 USC § 341. The RICO Defendants breached those duties through the Tay Tay Terror Attack; Tay Tay Terror Attack.

189. The term “internet” is defined herein pursuant to 21 USC § 802(50) – Internet.

190. The Defendants and or RICO included the trafficking and benefitting of Tay’s Name and Likeness<sup>35</sup> through wires and devices while profiting from and supporting the distribution of Tay’s Name and Likeness pursuant to 18 USC § 1593A (“Benefitting Financially from peonage, slavery and trafficking in persons”) - Trafficking in persons – also known as "human trafficking" – is a form of modern-day slavery by and through elementary, junior high, senior high and collegiate education [“K-20 Education Surveillance”]; School Board of Brevard County Florida, the State of Florida, Microsoft and the Sunshine Connection

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probable cause. The list of possible “tangible things” the government can obtain is seemingly limitless, and could include everything from driver’s license records to Internet browsing patterns. Section 215 has been used to obtain driver’s license records, hotel records, car rental records, apartment leasing records, credit card records, and the like.

<sup>35</sup> Means the name, image and likeness, character of or resembling work, but also signature, photograph, gestures, distinctive appearances, and mannerisms of a person.



surveillance program including but not limited to; Fl. Stat. 1002.20 (13) student records, (14) report cards, (17) athletics, (18) extracurricular activities, (19) instructional materials, health records and disciplinary actions; through applications for employment online and in person, or employment, W2 forms, interviews, background checks, job assessments, income tax amongst other things [“Employment RICO Surveillance”]; favorite teams, sports apparel and paraphernalia purchases, social media Interest, video game purchase and rental, school essays, cable programming, public comments, internet searches amongst other things [“Sports and Entertainment RICO Surveillance”]; food stamp agreements, food stamp card, Data Info, job searches and career resource center applications amongst other things [“Food Stamp RICO Surveillance”]; credit card purchases, video surveillance, receipts, amongst other things [“Restaurant RICO Surveillance”]; deposits, money transfers, electronic money transfers, money activity, accounts, withdrawals, receipts, purchase, stocks, return on investments (ROI), credit card or debit card purchases [“Money Bank RICO Surveillance”]; church memberships or rosters, tithes and offering, check and cash contributions, attendance, visitor registration, book purchases, music, amongst other things [“Religious RICO Surveillance”]; including but not limited to FAMU, yahoo and hotmail email accounts, K-20 Education Surveillance, AOL Aim messenger, yahoo messenger, social media logins, photos, stored data, cellular phone records, file transfers, driver’s license, license plates, Vehicle Identification Numbers (VIN numbers), State identification [“Communication RICO Surveillance”]; traffic tickets, court dates, court dockets, final judgments, criminal quota from environment amongst other things [“Civil or Criminal RICO Surveillance”]; hotel accommodations, dining, travel reservations, clearance of U.S. Customs, grade of petroleum or gas, purchasing price, location and time from credit card, debit card and cash purchases,



type of vehicle, parts and service purchases and agreements amongst other things [“Travel Surveillance”]; shots, allergies, registration, symptoms, health Data Info, surgeries, dental records, weight, billing, health insurance, life insurance, medications, sexual history, prescriptions amongst other things [“Medical RICO Surveillance”]. All of the above described acts of surveillance are now enjoined and hereinafter referred to as [“Tay Tay Terror Attack Surveillance”] from on, before and after February 9, 2009.

191. The Defendants and or RICO Defendants has a duty to promote honesty and fair dealing in the interest of consumers pursuant to Consumer Product Safety: 15 USC § 2051 and 42 USC § 16471. The RICO Defendants breached those duties through the Tay Tay Terror Attack (“Tay Tay Terror Attack”). RICO Defendants at all-times material, hereto, were in the business of providing goods and or services as defined within FL. Stat. § 501. 203(8), FL. Stat.

### *3. Employment and Education Scheme*

#### *a. K-20 Education Scheme*

192. At informational meetings and in telephone conversations, faxes, emails, contracts, and other written documents transmitted in early 1998 through approximately the present, FAMU and the State personally and/or through their agents, employees and/or representatives, told Tay that his Exclusive Name and Likeness would be an prominent asset to FAMU through the Tay Tay Terror Attack.

193. In such communications with Tay, the Defendants and or RICO Defendants further promised to act diligently and do everything necessary to obtain provide Tay a High Quality education and other opportunities within the FAMU culture.



194. Defendants knew or should have known, however, that they were operating within a nefarious education scheme to enslave Tay's Likeness for profit with the United States.

*b. Life as a Rattler*

195. Tay went out for the FAMU NCAA D-1 football team, but due to the Clearing House not communicating with FAMU and other discrepancies with team tryouts Tay decided to be a prominent and extraordinary student.

196. Though Tay's education was paid for by way of scholarship-endorsement from the Schenck Foundation (Fl. Stat. § 1009.01), he still had living expenses and received public and private grants and loans from financial aid through the U.S. Department of Education over \$50, 000.00 for 5 years to assist him in his livelihood.

197. Tay is and was a well groomed, God – fearing and “*So Sophisticated*”<sup>36</sup> young, educated and, and ambitious young black male that stop buying and wearing jeans and items of jean material<sup>37</sup> and started wearing slacks, collared shirts tucked in his pants and ties, belts, watch, earring, beautiful smile, fresh haircuts and a positive attitude<sup>38</sup>; at one time driving (2) vehicles to class; owning a 1995 Ford Crown Victoria<sup>39</sup> and financing a 2001 Ford F-150 Harley Davidson Edition (repossessed in June 2008) living in a one-bedroom, single apartment (evicted) about 2 miles from FAMU campus his Spring 2006-Fall 2008 years.

198. Tay used Gas Credit Cards including but not limited to BP and Chevron for gas to fuel his vehicles in the Name and Likeness of Sherilon and LISA to travel through interstate commerce while possessing marijuana.

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<sup>36</sup> Is a song by American hip hop recording artist Rick Ross. It was released on June 5, 2012 as the second single from his fifth studio album *God Forgives, I Don't* (2012).

<sup>37</sup> <http://slaveryinthe21stcentury.blogspot.com/2011/11/behind-cultural-icon-blue-jeans.html>; “*Behind a Cultural Icon: The Blue Jeans.*”

<sup>38</sup> See The Steve Harvey Collection. <http://collection.steveharvey.com/steve.html>

<sup>39</sup> Usually a later modeled law enforcement vehicle that drug dealers use to impersonate an officer so that can disguise their scheme and operation, just as law enforcement does.



199. Admiring the operation of black business in the World through the encounters with successful African American CEO's (i.e. Will Packard (FAMU Likeness), Rainforest Films), BE Magazine, VIBE, and other business and social magazines and his working environments, Tay's exclusive membership with "gurufocus.com" ("321CocoaBoss") and the NYSE Initial Public Offerings (IPO's) (CNBC's Money Market), Tay knew that in order to be a prominent entrepreneur that he must accessorize his image to assist him in the attraction and networking of other high quality citizens, businesses or projects to hold his name and likeness to the highest esteemed character. Tay bought Defendants Products through Representations to help him obtain his Self Made American Dream.
200. In Spring 2007, Tay's former professor Dr. Charles Beemer had a '*Adopt a City*' class project as a Owner of a Small Business who has operated in the same place for over 30 years and has financial difficulties, having other businesses and buildings around him get torn down aborted to make adjust to other city projects. Tay was 69 years old and hates the police and opposes innovative city projects to accumulate possible lucrative income for funds for the city.
201. Tay was tired of being confused in life and tired of the way he was living, and during the beginning of Fall 2007, Tay became a born again Christian by way of Rastafari ideology and beliefs by giving his life back to the Jesus Christ (Jah) [Hereinafter, "Tay's Heavenly Father"] and consuming marijuana to SAVE him from the evils of the world by having more of a Godly outlook on the decisions he made in life and by receiving watch-care from Pastor Cyrus Flannigan and the Family Worship and Praise Center (IRS; 501(c)(3)) in Tallahassee, FL where he became a major contributor spiritually and financially and became a regular attendee at bible study and Sunday morning worship.



202. The Devil's spirit began to attack immediately and conspired to conflict and or attempt to conflict Tay's spiritual [L]ikeness. From an appendix surgery almost losing his life, getting in a multiple vehicle accident and not having personal transportation for majority of the Fall 2007 semester at FAMU, to being evicted on September 22, 2007.<sup>40</sup>

203. But on February 13, 2007 is the day when Tay found his "Piece of Light" (*How I Got Over*. The Roots. (2010). He was in the most catastrophic fight for his life when he was admitted in the Tallahassee Regional Medical Center during the middle of his 3<sup>rd</sup> year at Florida A&M University when his appendix erupted. The eruption took place internally without Tay knowing, and took 1 week before he felt any pains from the eruption. Sherilon and Godma came from Cocoa to visit Tay while in the hospital while Sherilon tortured Tay with those same 807 S. Wilson Residence mental schemes to "Hold Tay Down" as suffering patient, full time FAMU student, entrepreneur and entertainer by making statements such as "Tay is playing, aint nothing wrong with him, he smiling and laughing" and not making Tay feel loved and or comforted.

204. On February 11<sup>th</sup>, he began having pains in his stomach which inflated as if he were pregnant, but thought it was just a huge gas bubble from consuming too much of Florida's best agriculture (marijuana) and or Defendants Wine and Liquor during the week, eating a 20 piece mc nugget from McDonald's and a few glasses of Carlo Rossi Blush the night before. In part, it was huge; a huge mess of "GAIN GREEN" diminishing his flesh while going in and out of the state of shock fighting for what could be the final fight of his life. That week was heartrending, being that Sherilon (and Godmother) had to come to Tallahassee from Cocoa, on her birthday which is on February 14 (Valentine's Day) to watch her son recover from almost losing his life. His mother's oldest sister died from diabetes on February 16<sup>th</sup>

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<sup>40</sup> See Case No: 07CC4112; In The County Court In and For Leon County, FL. *Carolina Square v. Smith*



2007. On this same day, Tay had an exclusive Valentine's party at the Double Tree Downtown hotel in Tallahassee. Tay was in the hospital recovering from almost losing his life, just then having lost his loving aunt, having to deal with an already scheduled yet incomplete event on behalf of his potential entrepreneurial project "Platinum Dolls Magazine." The event was a failure due to Tay fighting for his life and the Double Tree knowingly used Tay's Bank of America Platinum Card to retrieve his funds for some extraordinary fees. Tay could not cancel this event due to contract agreements and being unable to know how the event would go with already tickets sold and distributed to known and unknown guest.

205. Education Contracts or Self Made American Dream Contracts signed by Tay and other Documents provided to the United States, the State and FAMU by the Defendants through the use of mail and/or wire transmissions in and around early to mid-2003, further promised that Tay would promptly receive a High Quality education of all or nearly all of his payments as promised to accommodate the opportunities to enhance mankind.

206. During the Spring 2004 semester before the annual FAMU BCAA scholarship gala, Tay was asked to be a FAMU student guest speaker by Don and Clara Davis (Chapter member, FAMU alumni) as a marketing tool in McNair Magnet School's Media Center to entice and influence the FAMU culture to School Board and or Brevard students who had interest and or had been accepted to attend FAMU (i.e. Alicia "Ki" Hurd). Tay made arrangements without any compensation to entice the potential FAMU students to leave Tallahassee around the study of his mid-terms, and be a participant of the 2004 FAMU BCAA scholarship gala.

207. FAMU and the Defendants and or RICO Defendants knew and or should have known, however, that they were operating within a nefarious scheme to enslave Tay's Exclusive



Image and Likeness, Name and Likeness and Property and those similarly situated FAMU Plaintiff's into the FAMU culture for profit with the Defendants and or RICO Defendants and the State as described in the American Dream Contracts, other documents and misleading and deceptive advertisements.

208. FAMU enticed Tay's Exclusive Image and Likeness, Name and Likeness and Property and those similarly situated FAMU Plaintiff's into a 'Party with a Purpose' social – scholastic environment.

- a. Tay spent his financial aid and or credit cards and or debit cards on parties, fast food, 5 star restaurant dining, marijuana and alcohol, night club access, an exclusive Defendants and or RICO Defendants Hood Representation wardrobe, books, FAMU apparel, groceries, tour and travel, hotel lodging and other financial transactions to receive cash and or make purchases from Defendants.

209. Before September 24, 2007 is when Tay had a sorority girl (Delta Sigma Theta) who was the “worst girlfriend he ever had” and is the cousin of FL. Rep. Alan Williams, at the time Aide to the Mayor of Tallahassee. He and her visited Alan Williams<sup>41</sup>, his family, and a few frat brothers of his (Kappa Alpha Psi) at a cookout at his residence as they both fellowshiped and spoke about the issues in the black community, Florida as a whole, how to provide a luxurious life and security for your family and bar-b-q recipes and ideas.

210. Tay assisted Alan in passing out flyers in his run for Florida State House, District 8 in 2008 before he left Tallahassee. He and Alan became quite close during engagements at Parks and Crump, P.A. FAMU Homecoming events and events on behalf of FAMU SGA,

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<sup>41</sup> Alan was Chair Elect for Leadership Tallahassee, 2007; Chair of Youth Leadership Tallahassee, 2005-06; President of FAMU National Alumni Association, Leon County; Ebony Magazine's “Twenty Future Leaders Under 30” in 2003; Black Male College Explorers, Mentor and United States Commission on Civil Rights' Florida Advisory Committee, Member.





SNAAP, and NAACP such as the Martin Lee Anderson case, along with attorney's Benjamin Crump, Darryl Parks, and Prof. William "Bill" Proctor.

211. Tay was forced to work part and or full time while enrolled at FAMU as a full time student and member and or Executive Board member of prestige clubs and organizations on FAMU's campus to have a comfortable livelihood. Tay was forced into voluntary servitude to accommodate his living expenses and pay debt with companies in Tallahassee, FL including Buffalo Wild Wing's (BW3's) as Security, Federal Express Ground (FedEx Ground) as a Package Handler, and Late Nite Liquors as a customer associate:

- a. Tay used his Employment Identification Number and or Federal Tax Identification Number and or other login information through wires in computers and or computer devices to clock in and clock out and the Defendants and or RICO Defendants trafficked Tay's Exclusive Name and Likeness and Property through wires to enslave Tay while a full time student into the workforce culture for profit including but not limited to Federal Income Tax fees, and Social Security fees.
- b. At FedEx Ground<sup>42</sup>, Tay became enslaved to scanning and loading packages working from the hours of 2 a.m. to about 8 or 9 a.m., low wages, in a hot and or extremely cold warehouse; at BW3's, Tay was security and prevented underage drinking and or altercations and were enslaved to chicken wings and Long Island Iced Teas (LIT's); at Late Nite Liquors, Tay was an associate that became enslaved and or addicted to intoxicating liquors (Title 27 U.S.C. § 201) and the

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<sup>42</sup> Tay began his Fed Ex Ground employment in Rockledge, FL during the Summer of 2004 while working for Cocoa Hyundai as a Detail Specialist.



LGBT culture as his boss were LGBT and the business he owned next to Late Nite Liquors were a LGBT bar called "Brothers".

212. Fed Ex and BW3's knew and or should've known that Tay was a full time student and involved in FAMU campus organizations and activities. The Defendants and or RICO Defendants knew and should've known that they were agreeing to entice and lure Tay into voluntary enslavement for employment in the State with the pay per hour, employee benefits, other incentives and allegedly flexible working hours for prominent companies such as Cocoa Hyundai, Fed Ex, Buffalo Wild Wings, Ron Jon Cape Caribe and Books A Million by having him sign American Dream Contract, or take a drug test<sup>43</sup> and employing him.

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<sup>43</sup> Before employment with Ron Jon Cape Caribe, Tay was forced to take a drug analysis in Cape Canaveral about a mile from Ron Jon Cape Caribe. Tay's initial drug test assumed to have passed in which he paid for. Tay was called by Zilber or Ron Jon Cape Caribe Human Resources manager that he needed to take another drug analysis, paid for by Zilber or Ron Jon Cape Caribe, because his urine was too clear to test and forced Tay to take another. Tay took another drug analysis and Tay's urine came back clear and was employed by Zilber or Ron Jon Cape Caribe. Tay is religious marijuana consumer and athlete who drink plenty of water and Green Tea to replenish his body. Though that specific Lab technician had the right to reject Tay's urine due to it being too diluted, this was a forced scheme to make a drug, such as marijuana, detectable in Tay's urine because he is a black male from Cocoa attending the #1 HBCU in America, FAMU so that they would not have to hire Tay. The initial drug test with the result of "too clear" only meant that Tay was adequately hydrated. Ron Jon Cape Caribe and Tay mutually agreed to part ways after a scheme to terminate Tay based on alleged negligence of a customer contract in which he was forced to sign a "at fault" document though denying any wrongdoing or he would be fired for insubordination, and having a envious conversation with Manager, Tiffany Grundy who had recently took a vacation to travel out of State and had piles of work to administer with her signature. Tay was not authorized to do Tiffany's work. When Tiffany returned back to a desk full of work as she was overwhelmed, and Tay who took no time off had his desk clear of work that was caught up during his attendance. While Tay were waiting on a deal to be made so that he may administer the contract and or modify it, Tiffany got upset that Tay had nothing to do and she gave him no instruction to do any specific task. She told Tay "you need to find something to do" with a fierce attitude. Tay asked her to give him some work and even offered to help her, which she refused. Tiffany got upset that Tay were talking back to her and sent him home. The next day, as Tay came to work, Tay's desk was cleaned off with his personal items together on top the table next to his desk. His boss, Sharon Matthews spoke with Tay outside about what happened as they both mutually agreed that it was best that he not work for Ron Jon Cape Caribe anymore. This was a scheme to terminate Tay as Tay previously offered his intellectual property or joint marketing ideas to Director, Jon Cantena through a project proposal. Tay contacted exclusive employees or executives that Tay present to Ron Jon Cape Caribe for marketing and advertising, by and through Tay individually or as FOCUS Solutions Limited, Inc. CEO. Tay's project was denied and then later accused of mix and matching files with other Ron Jon Cape Caribe customers in which he had to sign the "at fault" agreement.



213. Every summer when Tay returned home from college, he'd connect with Michael Cadore<sup>44</sup> to participate in his "I Got Skillz Football Camp"<sup>45</sup> to train and encourage student-athletes to become better student-athletes. Mr. Cadore was so impressed with Tay's spiritual and social status that they developed a significant spiritual relationship.
214. Michael Cadore and his son visited Tallahassee in January of 2007 and contacted Tay around December 23, 2006 for Tay to guide them around the city, show them around campus and to meet the Tay's FAMU student body and or the FAMU NAACP. Tay had a busy schedule but made way for Michael Cadore and his son to visit his Political Science class with Dr. Charles Beemer (Kappa Alpha Psi) to speak to FAMU students to encourage them about the future and their role in it. Michael Cadore (Phi Beta Sigma) spoke to Tay's class after they took a test or quiz. Michael Cadore passed out his cards and enticed Tay's FAMU student body class to work in Defendants law enforcement as he passed out cards for FAMU students to contact him.
215. While employed with Ron Jon Cape Caribe, Tay and Michael Cadore came to an verbal agreement [hereinafter, "Oral Agreement" and or "American Dream Contract"<sup>46</sup>] over lunch at T.G.I.Friday's in Rockledge to organize and prepare the [NFL – Xbox NFL Street Unplugged project] at the RYFL football field at Rockledge Park during the RYFL jamboree or 1<sup>st</sup> organized team game of the season. Michael Cadore initially promised Tay about \$1500, then he verbally agreed to compensate Tay about \$4000 for his services and to make sure Tay had enough money to return to FAMU. During the NFL Xbox project, Michael Cadore, Tay and the NFL (Samantha Rappaport) sought to compensate Tay after completion

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<sup>44</sup> See <http://www.floridatoday.com/article/20071115/LIFE/711150309/Michael-Cadore-Rockledge>

<sup>45</sup> <http://www.mymetrotownnews.net/index.php?id=27562>

<sup>46</sup> See Legal and Binding Contracts:

<http://www.floridabar.org/tfb/TFBConsum.nsf/0a92a6dc28e76ae58525700a005d0d53/6a653200b74c8a2085257405007a3ac3!OpenDocument> and are herein defined as ... [American Dream Contracts].



of the project. The NFL told Tay and Michael Cadore that there was no money in the budget to compensate Tay. Michael Cadore lured and enticed and tricked Tay into service by Oral Agreement without signing any contract agreement between and or on behalf RYFL, the NFL, Xbox and or any other affiliated Defendant, with NFL J.P.D. and Michael Cadore “I Got Skillz” football camp apparel and accessories. Tay was bamboozled by Defendants and or RICO Defendants as they used Tay’s Name and Likeness for voluntary enslavement without pay for profit for the RYFL, the NFL and Xbox.

216. Tay emailed the NFL and notified them of what Oral Agreement that he had between he and Michael Cadore. The NFL never responded to Tay and Tay never received any compensation for his services including but not limited to organizing, field spraying and other field operations, coach and referee recruitment that were also promised pay and didn’t receive any compensation<sup>47</sup> from Defendants, team wins and losses, volunteers and other duties.

217. Tay communicated with FAMU professors and fellow student body member through email and telephone sharing trade secrets to complete coarse work and to scheme a plan of success for African American’s and other cultures including but not limited to theories, concepts, terms, poems, formulas, other characteristics, examples and criticisms.

218. As a FAMU student and full or part time employee, Tay were not eligible to receive food stamps and or receive any other form of assistance from the Government Goonz while juggling a coarse and campus leader.

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<sup>47</sup> Tay and other NFL Xbox employee – volunteers had to fill out financial forms and contracts to guarantee pay and or cause to believe pay would be compensated.



219. On August 28, 2007, Tay was approved an Academic Appeal for Satisfactory Academic Progress due to the distress of emotional disturbances of his childhood, his environment, church, school, working and organizational involvement prior to.

220. In Tay's capacity as FAMU SNAA Alumni Affairs Chairman he contacted, Mrs. Carmen Cummings (FAMU's Alumni Affairs Director), for a project proposal on behalf of the FAMU SNAA. This meeting was shortly after the 2007 FAMU Homecoming and or near the end of the 2007 Fall semester. Tay signed in the Alumni Affairs sign in sheet and then was directed to Mr. Vernon Bryant. Mr. Vernon Bryant then directed Tay to Ms. Carmen Cummings who rejected Tay's proposal for Trade Secrets on how to recruit and retain FAMU students or potential FAMU students and how to receive more donors to the FAMU Foundation from FAMU alumni and other Defendants and or RICO Defendants Defendants. FAMU misled and deceived Tay with their motto and mission as an Alumni Affairs Department.

221. FAMU used their motto "*Excellence with Caring*", their seal, mascot, colors, and its culture of hazing<sup>48</sup> to recruit, trick and conspire with the Get Money Mafia, the State and the United States against Tay for voluntary enslavement into the FAMU culture, heritage and atmosphere<sup>49</sup>. Tay enrolled at FAMU receiving financial aid and scholarship endorsements from the United States, the State, NPHC organizations, and other public and or private 501(c) organizations under State and United States legality to partially and or fully cover Tay's fees and costs of his collegiate education and living expenses. Tay paid FAMU room/board fees

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<sup>48</sup> See <http://diverseeducation.com/article/6712/#>; <http://www.thefamuanonline.com/news/hazing-at-famu-students-tells-stories-of-violence-mistreatment-1.2679797>; and <http://kollegekidd.com/news/omega-psi-phi-member-tells-his-story-on-hazing>.

<sup>49</sup> See <http://www.famu.edu/GiveToFAMU/AR4WEBReduced.pdf>.



for FAMU to harbor him on the campus of FAMU from Summer 2003 – Spring 2004 in Gibbs Hall, and Palmetto North, and Palmetto South.

222. FAMU has a duty for the commitment to providing students and alumni with a caring and supportive environment as well as the resources necessary to ensure their success and competitiveness in the world of work and further education.

223. The United States, the State, the School Board and the State willing and knowingly used FAMU Representations, the Defendants and or RICO Defendants Financial Institutions representations and FAMU alumni to enslave Tay into the FAMU culture and used Tay's Exclusive Name and Likeness and Property so that they can convert his financial aid for their benefit with profit, to increase higher enrollment, student retention, graduation, curriculum programs offered and FAMU as a brand, so that Tay can be buried in debt from a High Quality education at FAMU.

224. The United States and FAMU agreed to convert and use Tay's financial aid money and or student loans for public and private use pursuant to 20 USC § 1087ff.

225. At FAMU, Tay took up Computer Science (CIS) and Business (SBI) curriculums, but were recruited by FAMU School of Pharmacy's faculty, students, alumni, and friends and family from FAMU that represented pharmaceutical companies and drug stores with companies such as Walgreens and CVS to become a "*Legitimate Kingpin - Florida Dope Boy*" (Dr. of Pharmaceutical Drugs) ("Legal Dope Boy"); an administrator of over the counter legal drugs with State and U.S. Certification by the FDA. The Defendants and or RICO Defendants used 6-figure salaries and a USA – FDA certification to become a Doctor of Pharmacy to deeply root Tay in legal pharmaceuticals rather than organic, agricultural pharmaceuticals such as marijuana. He was told he had the opportunity to make a lucrative



spoke with Dr. about allowing him to walk with his class due to already ordering his cap and gown before the news from Dr. Inamente, not being informed on when those referred classes were going to be provided and available, and due to the extreme circumstances Tay had to endure. Through confirmation with Provost, Tay was not approved to march with his class. Tay marched anyway as he found a graduation slip<sup>58</sup> on the ground on FAMU's campus to obtain his cap and gown from the FAMU bookstore snuck his way into the mix of his class to receive his degree folder to place his Associates of Arts degree and were intentionally not named in the Spring 2008 Commencement<sup>59</sup> program at Florida A&M University as a Associate of Arts degree recipient.

232. FAMU failed to provide Tay a commencement ceremony as a General Studies - AA Degree graduate of FAMU and failed to recognize and or mention him publicly in any FAMU Spring 2008 commencement program as an AA Degree – General Studies FAMU graduate as a Public Administration/Political Science Major and Urban Economic Development Minor.

233. Tay earned his “thank you laude (Lord)” (i.e. magna cum laude, suma cum laude) degree from FAMU with “A Message from the President”:

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to at the time, employee shortage and budget cuts at FAMU and across the State, as Tay reached his limit of receiving financial aid as an undergraduate while forced to apply and receive an Associates Degree in General Studies while a Public Administration major. Tay was clearly in the School of Art and Sciences upon application for graduation and Associates Degree. FAMU did not provide Tay a Associates Degree from the School of Arts and Sciences as a Public Administration Major. Defendants also forced Tay to be homeless, to deprive him FAMU education to obtain his BA degree with financial resources from Defendants, not to attend class around mid March to April 2008 due to inadequate living conditions or accommodations including no light, hot water, fuel and or gas money, hot meals, no cellular phone service from Sprint, and forced Tay to run for Mayor of Cocoa in 2008 from the education, training and harboring within the FAMU culture for about 5 ½ years including summer school attendance.

<sup>58</sup> The slip needed to provide the FAMU bookstore in order to receive his cap and gown order to walk across the stage.

<sup>59</sup> See <http://www.famu.edu/index.cfm?a=headlines&p=display&news=785&archive>



This special moment in your life is a milestone you will remember and cherish for years to come. Now that you have obtained a college degree, it is time to utilize the education and skills you have obtained at FAMU in the profession of your choice.

In the days ahead as you reflect on the time spent at your alma mater, please know that wherever you go in life, and whatever you accomplish, the imprimatur of FAMU will always go with you.

Godspeed as you now take on new responsibilities and challenges and always remember that the same steadfastness and perseverance that brought you to this point will serve you well in your future endeavors.

Sincerely, James H. Ammons  
University President

234. Tay owes FAMU \$30 for an unpaid parking ticket as they notified Tay on and around December 13, 2012 and continuously.

235. Tay owned about (2) vehicles in his Name and Likeness and registered them with FAMU parking services to have access to student parking on FAMU campus. Due to FAMU having very limited parking for students, Tay was forced to park in unauthorized parking spaces and were either towed, ticketed, or booted in order to attend classes during a specific time<sup>60</sup> and events on campus. Tay would not have parked in unauthorized parking if spaces were available to him and near his class building. This distress caused Tay severe transportation, mental and financial harm which at times reflected in Tay's grades.

236. Tay is an official FAMU alumni with a Associates of Arts Degree in General Studies signed by 2008 Florida Governor Charlie Christ, 2008 FAMU President James A. Ammons, 2008 FAMU Chairman of Board of Trustees, and FAMU General Studies Dean, Dorothy Henderson with his degree stated as follows:

*Florida Agricultural and Mechanical University  
School Of General Studies  
Upon the Recommendation  
Of the faculty and by virtue of the authority of the  
Board of Trustees hereby confer upon  
Dontavious S. Smith*

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<sup>60</sup> Some professors made it a requirement that u be on time and or be on time to be available for roll call to get credit of class attendance. If you were not on time, with some professors, u were not allowed to enter the classroom or not included on the roll which was subject to class failure.





*The degree of  
Associates of Arts  
With all the rights, honors and privileges thereunto appertaining  
Witness the Seal of the University and the Signatures  
Of this duly authorized officers hereunto affixed.  
Given at Tallahassee, FL this twenty – fifth day of April, in the year of our Lord  
Two thousand – eight  
//signatures of the above mentioned officers and witnesses of Tay’s FAMU degree.  
(FAMU Seal)*

**c. Rattler Alumni**

237. When Tay ran for Mayor of Cocoa, a fellow classmate and childhood acquaintance Letitia Skippings (FAMU Likeness) did an article in the FAMUan on Tay’s Exclusive Image and Likeness and Name and Likeness on his efforts in running for Mayor of Cocoa, which were published as a mass print FAMU campus publication and online ([www.thefamuan.com](http://www.thefamuan.com)) by FAMU to benefit off Tay’s Exclusive Image and Likeness, Name and Likeness and Property for higher recruitment or enrollment of FAMU students as a class project.

238. FAMU used an image of Tay’s Exclusive Image and Likeness, Name and Likeness and Property on their website’s home page ([www.famu.edu](http://www.famu.edu)) with a photo slide during the summer of 2008<sup>61</sup> as a recruitment tool to lure and entice potential students to apply and enroll at FAMU, and for donors to donate to FAMU from Tay’s Exclusive Image and Likeness, Name and Likeness and Property. Tay also donated his remaining Mayor of Cocoa 2008 campaign funds to the FAMU Scholarship foundation which were to benefit the endowment program and Defendants and or RICO Defendants Financial Institutions Representations in the endeavor to use Tay as an Exclusive “Hidden Slave.”

239. On, before and after March 5, 2009 by and through the School Board and the State RICO Enterprise, Tay was denied employment based on a falsified drug test because of Tay’s Exclusive Image and Likeness, Name and Likeness and Property. This was a scheme in

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<sup>61</sup> Picture of Tay and his FAMU brothers, Jude Dusti (Up Psi – Omega) and Omari Crawford (Up Psi – Omega) standing and smiling the victory of success as FAMU graduates.



retaliation of Tay's Exclusive Image and Likeness, Name and Likeness and Property at FAMU, and running for Mayor of Cocoa in 2008 at 23 years old being Central Florida's youngest African American male Mayor candidate, and or being Tay's Exclusive Image and Likeness, Name and Likeness and Property as a black male from Cocoa through the Tay Tay Terror Attack (FL. Stat. § §163.502, 1004.65, 1012.98; and Cocoa municipal ordinance 15-5). FAMU, the School Board and the State RICO Enterprise knew and or should have known that he was the target of the Tay Tay Terror Attack which they received profit from to use Tay's Exclusive Image and Likeness, Name and Likeness and Property as a Hidden Slave in Cocoa, the State and United States.

240. As a past participant of the FAMU BCAA annual scholarship gala for many years, which featured Tay's Image and Likeness and Name and Likeness in the FAMU BCAA program, President Richard "Dick" Blake<sup>62</sup>, the City of Rockledge's "*Lifelong President*" and those on behalf of FAMU and on behalf and affiliated socially and financially with the FAMU BCAA, including but not limited the Defendants and or RICO Defendants and those affiliated and on behalf of them, influenced and embedded Tay to attend FAMU and serve his community in "*Excellence with Caring*." At or around the end of March 2009, April 3, 2010<sup>63</sup> when Dick Blake stated that FAMU, FAMU BCAA and those affiliated and on behalf of Cocoa, Brevard, and the State have joined Obama with his "*Education to Innovate*" campaign initiative, also in 2011 and March 31, 2012. FAMU BCAA knew Tay was a product of Brevard, Brevard Public Schools, and a graduate of FAMU and had run for Mayor of Cocoa. Because Tay ran against Dick Blake's son, Mike in 2008, Tay was not involved, mentioned, awarded, acknowledged, encouraged nor received any accolades by, for or on behalf of

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<sup>62</sup> [http://www.cityofrockledge.org/Pages/RockledgeFL\\_Council/Blake](http://www.cityofrockledge.org/Pages/RockledgeFL_Council/Blake)

<sup>63</sup> Dick Blake stated in his "Greetings... From the Desk of the Chapter President". 2010 gala program "2010 Orange and Green Affair."



FAMU BCAA at any Brevard County gala from the dates mentioned as FAMU failed to represent their motto “Excellence With Caring” and promoting a safe environment for donors, students, alumni, educators and future and potential students. FAMU BCAA distributed scholarships to deserving Brevard public school students as a representation of the School Board’s motto “Future of Florida’s Space Coast” as members, educators and students of the School Board and on their behalf induced Tay to contribute to support the “Future of Florida’s Space Coast” to display “Excellence with Caring” and used Tay’s Exclusive Image and Likeness and Name and Likeness to recruit and embed his likeness for students to attend FAMU and donors to contribute.

241. As an alumni ambassador for FAMU, Tay promotes the annual Florida Classic between FAMU and Bethune Cookman University<sup>64</sup> publicly through his Exclusive Image and Likeness, Name and Likeness and Property including but not limited to FAMU paraphernalia, and FACEBOOK, formerly sponsored by Walt Disney World and now sponsored by unnamed parties Blue Cross Blue Shield and other contributing sponsors including but not limited to Miller – Coors, State Farm, and televised on and through the ESPN or Defendants named and unnamed networks at the Florida Citrus Bowl in Orlando, FL. Florida Citrus Sports serves as the exclusive marketing rights holder of the Florida Classic. McDonald’s 365 Black also is a sponsor of the Florida Classic to indulge and embed Tay to be “deeply rooted” to the McDonald’s 365Black initiative and continued to purchase McDonald’s products with celebrity Name and Likenesses making their menu look even more famishing and indulging to become a ‘Legendary’ Name and Likeness for his

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<sup>64</sup> America’s #1 attended historically black college football game. Each year nearly 60,000 fans pack the Florida Citrus Bowl Stadium and over 175,000 travel to Orlando for the week’s festivities. With an economic impact of over \$30MM annually on Central Florida, simply put, the Florida Classic game and ancillary events provide the foremost multicultural sports marketing opportunity in the nation



community. This classic is known for and as “The HBCU Classic of all Classics... Where all game proceeds benefit educational opportunities for deserving students<sup>65</sup>” and used Tay’s Exclusive Name and Likeness and Property to trick, deceive and mislead him and the public for opportunities for equal employment and or equal access to education in the State, Brevard, Cocoa and Florida’s Space Coast through television, billboards, the internet and the enslaved “deeply rooted” culture.

242. On or around August 2007 (Back to School photo gallery) and November 22, 2008, Tay was featured on [www.tallahassee.com](http://www.tallahassee.com)<sup>66</sup> and or facebook.com (on November 23, 2008 shared by friend Chantel Bowie) using his Image and Likeness to entice past, future and present FAMU students, fans and donors to contribute to FAMU and or attend FAMU or contribute and attend HBCU events.

243. On and around January 20, 2013 FAMU and FAMU BCAA solicited Tay’s financial support for \$100 and above and to be recognized as a “Difference Maker” in the Scholarships and Awards benefit entitled: “Sweet 16 – Reaching Back – Giving Back” Campaign Drive to inflict distress on Tay as they willingly and knowingly solicited financial support knowing he’s a suffering Pro Se litigant against the School Board and other named and unnamed Defendants in the “Tay Tay 321 Terror Attack” so that he can be mentally hazed as a “fallen” and or “hidden rattler.” (“Hidden Slave”)

244. The Defendants and or RICO Defendants misled and deceived Tay with the motto “Deeply Rooted in the Community 365 Days a Year” to celebrate Tay’s achievements in his African American community of Cocoa. Tay indulged and relied on FAMU’s

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<sup>65</sup> See <http://www.floridaclassic.org/Portals/0/Florida%20Classic%20Sponsorships%202010.pdf>

<sup>66</sup> <http://rattlernews.tallahassee.com/apps/pbcs.dll/gallery?Site=CD&Date=20081122&Category=PHOTOS03&ArtNo=811220813&Ref=PH&Params=Itemnr%3D15> (pic 15 of 32).



Representations, and their deceptive and misleading advertising to be a drum major (Marching 100) in his community in the areas of education, employment, entrepreneurship, public service and entertainment believing that his indulgences in these areas were valuable human assets to his environment and community, and humankind. Within that indulgence and representations of Tay Exclusive Name and Likeness and Property being denied employment and receiving food stamps, Tay was schemed upon to be enslaved in Cocoa through the misleading advertising of FAMU and the Defendants and or RICO Defendants representations.

245. FAMU has an endowment of around \$88 million, the Florida Dept. of Education annual budget is about \$23 billion, and the USDOE budget increased from \$32 billion in 2009 to \$69.8 billion which were all used to profit from the trafficking scheme of Tay's Image and Likeness, Name and Likeness and Property and Plaintiff's of Tay's FAMU Likeness.

246. At informational meetings and in telephone conversations, faxes, emails to and from his e-mail address [flanative\\_cocoa321@hotmail.com](mailto:flanative_cocoa321@hotmail.com), education contracts, and or other written documents transmitted in early 1998 through approximately the present, FAMU, Cocoa, Brevard and the State personally and/or through their agents, employees and/or representatives, told Tay that his Exclusive Name and Likeness would be an prominent asset to FAMU. As a School Board and State student – athlete, Tay was informed on multiple D II and or D III colleges and university football opportunities, and even communicated with FAMU former head coach William "Billy" Joe and or Defensive Coordinator Clifton Moore and or FAMU football player Joe Sanders through email, FAMU BCAA alumni gala's and or FAMU Homecoming's and or Florida Classic's about the opportunity to walk on and or be



an honorary walk on for the opportunity to play NCAA Football<sup>67</sup> at FAMU. (Hereinafter “Tay’s FAMU Likeness”)

247. In such communications with Tay, FAMU and the State further promised to act diligently and do everything necessary to provide Tay a High Quality education and other opportunities within the FAMU culture through their vision and mission statement including but not limited to “FAMU will provide the citizens of Florida, the nation, and the world with inspirational teaching, relevant research, and meaningful service by offering opportunities to enhance humankind” and “FAMU is to provide an enlightened and enriched academic, intellectual, moral, cultural, ethical, technological and student-centered environment, conducive to the development of highly qualified individuals who are prepared and capable of serving as leaders and contributors in our ever-evolving society.”

248. Tay was told by and through the Tay Tay Terror Attack and FAMU RICO Enterprise that if he did not graduate high school, pass the SAT and or ACT, apply to college, get accepted into college, pay for college, enroll in classes, go to classes, get good and or decent grades in college and show good character he couldn’t graduate or receive a degree, find a prominent job and or receive his *Self Made American Dream* through the legislation of the Florida Department of Education in and for the State and United States.

249. Tay was acknowledged by the Schenck Foundation as a prominent black, African American male student-athlete from Cocoa that attended Rockledge High School around mid to late 2002 or early 2003. The Schenck Foundation knew and or should’ve known that Tay

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<sup>67</sup> Tay applied to the NCAA Clearinghouse and paid the mandatory \$70 fee to become an eligible NCAA student – athlete on and around Fall 2002 or Spring 2003, and the NCAA Clearinghouse did not contact FAMU and or FAMU told Tay that they had no information from the Clearinghouse about his eligibility. Tay played intramural football at and for FAMU.



was from a low income single family household and had vision of going to college and “Becoming Legendary” in civil and social issues in the U.S. and Foreign Countries.

250. The Schenck Foundation donates resources to the Brevard Schools Foundation or the School Board to increase financial resources for the School Board and students on Florida’s Space Coast.

251. The Schenck Foundation interviewed Tay and other students for the scholarship endorsement to attend FAMU or any other college. Tay had a successful interview and The Schenck Foundation awarded Tay a 4 year \$20k endorsement to attend FAMU. The Schenck Foundation agreed to pay FAMU on Tay’s behalf, \$5000 per Fall and Spring semesters, per year for tuition and or room and board. The Schenck Foundation sent checks on behalf of Tay to FAMU’s Student Accounts or the FAMU Financial Aid or the FAMU Foundation to pay Tay’s fees pertaining to that specific semester.

252. If Tay did not apply for the scholarship endorsement for financial aid to attend college, have the required qualifications, get selected for an interview, and have a successful interview, Tay would not have been able to receive the scholarship endorsement to attend FAMU. Tay was forced to have the required qualifications while in the High Quality educationK-12 curriculum with the School Board and State, forced to apply for a full scholarship endorsement because he is poor and does not have the financial means to go to college, and forced to attend and enroll in college or FAMU so that he could receive the required skills and knowledge (education) to be a key component for the State and the U.S. and Foreign Countries.

253. The Government Goonz, the State, FAMU BCAA, Dick Blake and the Scheck Foundation agreed willingly and knowingly to work together to target intelligent and aspiring



black males who want to attend college such as Tay and his brother Tavares Walters, from Brevard and or Cocoa to apply, enroll and attend FAMU to provide them funds to attend to benefit from Tay's Name and Likeness and Property.

254. FAMU disbursed money in Tay's student account and deducted those FAMU fees with the remaining amount for Tay's personal use. Tay's personal use included the purchase of Defendants Representations and or Defendants Products<sup>68</sup> with financing from Capitol City Bank to purchase a custom Harley Davidson F-150.

255. FAMU agreed with the State, the United States and the Defendants and or RICO Defendants to indulge in a scheme to place Tay's Exclusive Image and Likeness, Name and Likeness and Property in debt including but not limited to student loans and or credit card enticement schemes, including but not limited to holding Tay's money from his scholarship endorsements, grants and loans until enough interest were accumulated and profited in FAMU's endowment and or financial accounts in Depository Institutions and or the Federal Banking System. Before and on August 6, 2007, Tay was induced by Citi Bank to apply for credit cards, student loans and other financial services that he received and maxed out due to his financial ignorance and extreme need and is now in extreme debt:

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<sup>68</sup> A black on black 2001 Ford 150 - Harley Davidson Edition that was repossessed by Capitol City Bank; rent for housing that he was evicted from in Tallahassee; food from Wal Mart that end up spoiling, McDonald's and brands for the Darden Restaurants that he can't even buy a "Happy Meal" or "appetizer", and if he could he still wouldn't be Happy because it'll just be a "teaser" to titillate his famishing appetite; toothpaste by Crest 3D for his attractive smile that hasn't been professionally clean since 2007; cologne by Omnix; wine spirits by Carlo Ross and Barefoot; a distinguished wardrobe by The Steve Harvey Collection, Nike (Air Stab, Tiger Woods, Roger Federer and Brand Jordan), Stacy Adams Brio and Access loafers, and Ralph Lauren and U.S. Polo; deposits in the Defendant's financial institutions; gas to travel for weekend getaways and road trips to primetime NCAA, NFL and NBA events; hair clippers by Andis and razors that probably caused him self-inflicted wounds to the back of his scalp; House of Cheatham products for his skin and hair treatment; cruise vacations by Royal Caribbean Cruise Line and Carnival Cruise Line out of Cape Canaveral, FL; objects for members of Omega Psi Phi; monetary loans, philanthropic support to various churches, family, his alma mater and friends; forming his private S-Corporation FOCUS Solutions Limited, Inc. and fictitious business Folk Tell Publishing Group, Inc. in Florida; and endorsements to political campaigns.





- a. Hoping to further his education, Tay was deluded into accepting loans and credit cards that he believed could be payed once studies are completed and have received his degree.
- b. Tay believes the United States and State college education system is a scam that turns vulnerable young Americans into debt slaves for life.
- c. The U.S. has been experiencing 5.15% annual college tuition inflation this decade. Despite this, 70.1% of high school graduates are now enrolling into college, a new all time record. 2/3 of college students are now graduating with an average of \$24,000 in debt.
- d. The statistics show that student loan debt has now surpassed credit card debt in the U.S., with many of those loans unable to be paid back, proving this scam is yet another system of debt enslavement set up by the banking elite (Defendants and or RICO Defendants and Big Bank Entertainment)
- e. Defendants and or RICO Defendants Financial Institutions or financial institutions such as Bank of America, Wachovia, Citi Bank and Discover lured, enticed and targeted Tay and enticed him to apply for credit card with 'free' initiatives knowing that he was the victim of a debt slave scheme (Tay Tay Terror Attack) on and or around the campus of FAMU and or Florida State University (FSU) and or the Tallahassee community located at including but not limited to a subway for a free 6' inch sub, and or Pizza Hut for a free personal pan pizza.
- f. Credit card companies (Defendants and or RICO Defendants Financial Institutions) see the gap of what college students want to do and what they have the financial capability of doing, and to fill that void they target students knowing



their ability to spend and their ignorance to how credit cards work. Credit card companies attract students through incentives such as free shirts and other items in order to get the student to fill out an application for a card. Many credit card companies see college students as a new market that can be easily influenced to sign up for something they do not understand and that card owners tend to remain loyal to their first credit card company throughout adulthood<sup>69</sup>.

256. Tay was forced to use VISA logo credit and debit cards from Bank of America, Wachovia, Citi and any other Self Made American Dream agreement for Tay to deposit, withdraw, and or overdraft his personal accounts.

257. As an enrolled student having contractual obligations through those education contracts, of those obligations were the Rattler Oath, stating: *"My Head shall always be held high, not to boast or brag, but of knowledge of my ancestry (full of Kings and Queens residing on the highest hill that is FAMU). My Hand shall never cease to work to preserve the blood, sweat and tears my forefathers shed. My Heart shall never cease to love and care for my fellow man, my family and my community. I am the Head, I am the Hand, I am the Heart, I am a Millennial FAMUan and in the Field I Shall be Great! I REPRESENT FLORIDA AGRICULTURAL AND MECHANICAL UNIVERSITY ESTABLISHED OCTOBER 3, 1987!"*

Tay took the Oath of FAMU as a student and alumnae. ("Tay's FAMU Likeness") ("Tay's Exclusive Image and Likeness, Name and Likeness and Property and those similarly situated FAMU Plaintiff's")

258. Based on these Education Contracts, other American Dream Contracts and other contractually-binding promises made to Tay regarding a FAMU High Quality education and work opportunities in the United States with a FAMU degree, award, certificate and or

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<sup>69</sup> <http://studentperspectivesf32.blogspot.com/2009/09/credit-card-conspiracy.html>



background, Tay signed Education Contracts and paid money at various points in early to mid-2003 to the Spring of 2008 with the United States, the State and FAMU to attend FAMU, receive financial aid, to live on FAMU's campus, to have a meal plan at FAMU and enroll in classes to obtain a High Quality education from FAMU, to be active in campus organizations and to attend popular concerts and activities. Tay had his financial aid direct deposited into his bank account(s) while enrolled at FAMU. FAMU used wires and devices including but not limited to Tay's iRattler and/or FAMmail account activation, Tay's FAMU email account, password support and problem resolution, Tay's connectivity to the University's Internet Network, and Wireless internet setup for Tay's personal laptop.

259. At FAMU, where he arrived a couple weeks after high school graduation for the Summer 2003 session B; he "cultivated" an immediate exclusive social status by associating himself with the 'Who's Who' on various campus,<sup>70</sup> and with local and State government officials and providing innovative networking socials just as "Nino Lyons" did at different venue locations in and out of the United States with citizens from all over the world through tour and travel, at homecoming events with BET (Black Entertainment Television), McDonald's 365 Black and BET's Black College Tour<sup>71</sup> production, his special and elite relationship with members ("The Bruhz") of the Mighty Melodic Bloody Up Upsilon Psi Chapter of Omega Psi Phi Fraternity Inc. ("**Friendship is Essential to the Soul**") and bruhez who were apart of the organization nationwide, and by continuing his civil service by serving at least two times on the Board for the FAMU- NAACP Chapter for Press and Publicity and Community Service, and the Florida A&M Alumni Association - Alumni Affairs Chairman. He began being a licensed distributor of Tahitian Noni (Bora Bora, Tahiti – French Polynesian) under

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<sup>70</sup> FAMU, FSU and TCC student body, staff and administrators.

<sup>71</sup> See <http://www.thefamuanonline.com/2.10461/tour-hits-campus-1.1406819>



the operations of Mr. Marvin Greene while being a “student-elitist” learning the philosophy of Socrates and “*The Apology*” (the “**Horse Trainer Analogy**” and the “**Unintentional Argument**” theory).

260. On July 26, 2007, the State of Florida, the Florida Department of State and Divisions of Corporation certified FOCUS as a Florida business/corporation by Secretary of State Kurt Browning with Tay as the Chief Executive Officer (CEO) forcing Tay to pay fees for business registration and or to do any and all legal business in the State of Florida willingly and knowingly engaging in and benefitting from the Tay Tay Terror Attack

d. *Obama’s Path to Presidency*

261. Obama’s path to presidency was cleared by and through Tay’s Exclusive Name and Likeness and Property, and the RICO Defendants Representations<sup>72</sup>, including but not limited to FAMU and other HBCU institutions, and a portion of the United States and State’s citizens to observe a ‘*Legendary. Deeply Rooted. Presidential Boss Swagger.*’

262. On about Friday August 24, 2007 on the campus of FAMU in the Gaither Gymnasium, Obama charged Tay to pay about \$10 for a ticket to hear him speak. Tay assisted and helped his FAMU classmate and former FAMU SGA President, Monique Gillum, in arranging the rally by passing out flyers and other ‘voluntary’ help Tay donated to Obama in return of a promising and encouraging future<sup>73</sup>. Obama knew and should’ve known Tay would rely on these statements and promises that he made hereafter.

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<sup>72</sup> Tay relied on the promises and representations of Obama and the State for the opportunity to “Get America Back to Work” to guarantee an equal opportunity in the pursuit of happiness and to enjoy life as an American citizen. Tay believed it was safe to use his talents to apply and obtain employment to earn income; receive higher education and publicly say what he felt about education, religion and current events.

<sup>73</sup> Obama made the statement “America is hungry for change. America wants something different” to lure Tay’s Name and Likeness to support or continue to support his 2008 Campaign. Tay, as a student – leader

263. Tay worked tirelessly for Obama in 2007 and 2008 while a CEO and student leader at FAMU, and in 2012 as a Facebook member to get Obama elected for promises made by Obama to Tay such as; "I'll recruit an army of new teachers, and pay them higher salaries, and give them more support. And in exchange, I'll ask for higher standards and more accountability."<sup>74</sup>

264. Around September 2008, Tay went to Obama's Brevard County Democratic Party headquarters downtown Cocoa to meet with the local organizer (name unknown, but something similar to "Keno" residing in California) to partner in a event in Cocoa such as the proposed project to ensure local citizens a meet and greet with qualifying local, state and federal candidates. "Keno" said to Tay that his project was a "good idea" but they could not and would not endorse such a project.

265. Obama enticed Tay's likeness and those similarly situated as he through the *Obama Deception* and used Tay for his [Name and Likeness] support and to encourage other citizens, especially from his generation and community to register and Vote him as President of the United States. Tay's Exclusive Name and Likeness helped Obama win President of the United States of America in 2008 as FAMU's marching band ("*The Marching 100*") performed at his inauguration. Obama also won the 2012 United States Presidential election due to Tay's Exclusive Name and Likeness and Property. Tay used Facebook and other

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(NAACP FAMU Chapter Executive Board) coerced other students and people he had contact with to vote for Obama, because of the "campaign relationship" he had with Obama relying on those same promises. See and hear <http://blazinstreetz.com/138.barack-obama-speaks-at-famu-news.html> and <https://www.youtube.com/watch?v=P-0aHFLqj88>.

<sup>74</sup> The stimulus paid for about 342,000 K-12 teaching jobs from 2009 to 2010, according to an analysis from the Center on Reinventing Public Education, an organization affiliated with the University of Washington. Through Race to the Top, which has already awarded more than \$4 billion to 18 states and the District of Columbia, some teachers will be paid based on merit. See <http://www.cbsnews.com/news/obamas-2008-promises-kept-or-broken/3/>.



social media sites, and in person communications to get citizens to vote for Obama.

["Obama's Broken Promises"]

266. On July 13, 2012 in Roanoke, VA, [United States] during his campaign tour, Obama made the statement "if you got a business, you didn't build that... Somebody else made that happen" to Tay as a business owner knowing that Tay would rely on that statement as a business owner who '*made*' Focus Solutions Limited, Inc. with his shareholders and hard earned money to invest in their *Self Made American Dream*. During this campaign speech, Obama admits to the aiding and abetting of Defendants to Deeply Root Tay and Tay's [L]ikeness in poverty through the Tay Tay Terror Attack.

See

[http://www.slate.com/articles/news\\_and\\_politics/politics/2012/08/you\\_didn\\_t\\_build\\_that\\_it\\_doesn\\_t\\_matter\\_what\\_obama\\_meant\\_to\\_say\\_but\\_what\\_people\\_heard.html](http://www.slate.com/articles/news_and_politics/politics/2012/08/you_didn_t_build_that_it_doesn_t_matter_what_obama_meant_to_say_but_what_people_heard.html)

267. In Tampa, Florida [State] on August 29, 2012 at the Republican National Convention, the Florida Republican Party intentionally inflicted distress to Tay with Obama's<sup>75</sup> "you didn't build that speech."

268. Around September 16, 2008 United States seized control of AIG --one of the world's biggest insurers -- in an \$85 billion deal that signaled the intensity of its concerns about the danger a collapse could pose to the U.S. and Foreign Countries financial system. Under terms, the Federal Reserve will lend up to \$85 billion to AIG, and the U.S. government will effectively get a 79.9% equity stake in the insurer in the form of warrants called equity participation notes. The two-year loan will carry an interest rate of Libor plus 8.5 percentage points.

269. The seizing of AIG put the United States in control of a private insurer -- a historic development, particularly considering that AIG isn't directly regulated by the federal

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<sup>75</sup> See <http://www.cnn.com/2012/08/31/politics/fact-check-built-this>.



government. The Federal Reserve took the highly unusual step using legal authority granted in the Federal Reserve Act, which allows it to lend to nonbanks under "unusual and exigent" circumstances<sup>76</sup>.

270. The Defendants and or RICO Defendants and its members intentionally violated the Dodd Frank Wall Street Reform and Consumer Protection Act including but not limited to the Banks and Banking Chapter 12 USC § 5462, 12 USC § 5463, 12 USC § 611, 12 USC § 1841, 12 USC § 1851(b)(4), 12 USC § 1813(c)(1), and 12 USC § 1841(p) to scheme, enslave, mislead and deceive Tay by and through the March 5, 2009 Document and or the Tay Tay Terror Attack, United States Currency and the Stock Market Scheme within the Tay Tay Terror Attack under *The Obama Deception*<sup>77</sup>.

*i. LGBT scheme*

271. The Defendants and or RICO Defendants took the Oath's to protect Tay and to influence an environment that produces the common good. A LGBT relationship cannot produce a child (a life) by and through male and male sex, and or female and female sex. The only result from male and male sex, and or female and female sex are including but not limited to sin (Holy Bible), AIDS/HIV, STD's, genetic and mental homosexuality, etc. which therefore was known and should have been known by the Defendants and or RICO Defendants before, during and after they took the Oath's of their respective office.

272. The scheme is for Tay to allegedly become gay black man and or a LGBT advocate and or contributor and or comfortable with the LGBT culture, believe in same sex marriage

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<sup>76</sup> See <http://online.wsj.com/article/SB122156561931242905.html>

<sup>77</sup> A documentary about Barack Obama; "the Obama phenomenon is a hoax carefully crafted by the captains of the New World Order. He is being pushed as savior in an attempt to con the American people into accepting global slavery." Further, the historical story given as background - the long conflicts in early American history over a national bank, the establishment of the Federal Reserve, and so on - all can be strung together to sound as though it's always been "bankers" vs. "the people." ["President's Broken Promises"] See [http://www.bloomberg.com/apps/news?pid=newsarchive&sid=a0NI\\_jE\\_U.00](http://www.bloomberg.com/apps/news?pid=newsarchive&sid=a0NI_jE_U.00)



equality, defy God's Commandments (adultery) by including but not limited to gay porn, strip club erotica, under age prostitution, rape, child molestation ("sex slave") so that he may be declared an alleged sex predator, a pedophile and or child molester, have protected and or unprotected sex with other men and or women to develop strands of HIV and or AIDs and or other STD's (sexually transmitted diseases) to pass those strands and cells through protected and unprotected sex with other men and or women to other men and or women to, including but not limited to, commit suicide, commit murder, to slow down and or minimize the black, African American mortality rate in The State<sup>78</sup>; and or to be attracted to and intimate with a woman who has the potential to be Tay's wife and or is Tay's wife while being intimate with another man so Tay and his potential wife and or wife can get a divorce to increase the African American and population divorce rate in the State and the United States due to the LGBT culture and State's black male HIV and or AIDS, and or STD's to infect their potential children and or their children with HIV and or AIDS, and or STD cells to rely on the State's and United States' pharmaceutical medications to die.

273. The State has the 8<sup>th</sup> highest divorce rate in America and schemed through the Tay Tay Terror Attack to entice and induce Tay to not get married and be sex slave, and or get married as a sex slave to get a divorce.

*"Blacks are more likely to get divorced because, first they are poorer, and poverty strains marriages, and second because African-American culture places more weight on ties to grandmothers, aunts, and other kin than does European-American culture, compared to the ties between husbands and wives."*

See

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<sup>78</sup> [http://www.doh.state.fl.us/disease\\_ctrl/aids/MSM\\_10\\_15\\_07.pdf](http://www.doh.state.fl.us/disease_ctrl/aids/MSM_10_15_07.pdf)





<http://www.divorce360.com/divorce-articles/news/trends/african-americans-and-marriage.aspx?artid=1176>

274. A divorce of marriage with a woman as your wife is a sin in Tay's religion<sup>79</sup> with his Heavenly Father.
275. The March 5, 2009 Document and or the Tay Tay Terror Attack; trick and or scheme was to induce and or persuade Tay that God and his Heavenly Father lied to him by creating him to be a Christian, heterosexual, black male to entice him into the homosexual and poverty culture (slavery) to cause severe religion, mental, emotional and physical distress to place him in poverty so that he could potentially lose interest in women, and become attracted to men and have a LGBT same sex marriage, so that Tay could not have a strong, powerful and reflective African American man and woman family life (Tay's Exclusive Image and Likeness, Name and Likeness) as a successful public figure and Exclusive Name and Likeness married with a beautiful home, a wife, some kids, a dog, a luxury lifestyle in pursuit of a happy life (Tay's Exclusive Image and Likeness, Name and Likeness and Property) and a Self Made American Dream on, before and after March 5, 2009 by way of the Tay Tay Terror Attack.
276. The State provides minority HIV/AIDS initiatives and HIV/AIDS Hepatitis Programs to citizens to educate, manipulate and deceive its citizens about the HIV/AIDS awareness<sup>80</sup> while receiving federal and private funding, having the 2<sup>nd</sup> most populated LGBT community behind California with 4.6% and approx. 609, 219 citizens<sup>81</sup>. In **Florida**, Blacks accounted

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<sup>79</sup> Holy Bible, Mark 10; 1-12

<sup>80</sup> [http://www.doh.state.fl.us/disease\\_ctrl/aids/Minority/minority\\_initiatives\\_index.html](http://www.doh.state.fl.us/disease_ctrl/aids/Minority/minority_initiatives_index.html)

<sup>81</sup> [http://en.wikipedia.org/wiki/LGBT\\_demographics\\_of\\_the\\_United\\_States](http://en.wikipedia.org/wiki/LGBT_demographics_of_the_United_States)



for 49% of total HIV diagnosis and 60% of AIDS case deaths in 2011, even though Blacks made up approximately 15% of Florida's population. (HIV Among Blacks Fact Sheet)<sup>82</sup>

277. The Defendants uses their Representations to induce and entice Tay's Exclusive Name and Likeness and Property into the forced slavery of the LGBT culture through sports, politics, media and other representations including but not limited to the NBA<sup>83</sup>, the NFL<sup>84</sup> and politicians<sup>85</sup> including but not limited to Michelle Obama, and Wasserman Schultz, a Florida congresswoman<sup>86</sup>.

278. On May 9, 2012<sup>87</sup> Obama announced publicly that it was ok for same sex marriage and that "same sex marriage should be legal" which was to intentionally commit harm to Tay through the Tay Tay Terror Attack by way of the President's Broken Promises and the LGBT RICO Enterprise:

*"At a certain point, I just concluded that for me, personally, it is important for me to go ahead and affirm that I think that same-sex couples should be able to get married."*

279. Obama was known to set and or start a 'Gay History' with a series of events to entice Tay from about May 9, 2012 to the present into the gay culture with Rhode Island and Delaware recently becoming the 10<sup>th</sup> and 11<sup>th</sup> state to legalize same sex marriage and was labeled as the "The First Gay President" by Newsweek. Jonathan Capehart of the Washington Post even declared the target marketing that Obama and the United States used in the LGBT RICO

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<sup>82</sup> <http://southernaidsstrategy.org/2013/02/07/blacks-disproportionately-affected-by-hiv-aids-in-the-south/>

<sup>83</sup> <http://sportsillustrated.cnn.com/magazine/news/20130429/jason-collins-gay-nba-player/>

<sup>84</sup> <http://miamiherald.typepad.com/gaysouthflorida/2013/04/from-home-in-fort-lauderdale-linebacker-brendon-ayanbadejo-continues-his-pro-gay-activism.html>

<sup>85</sup>

[http://en.wikipedia.org/wiki/List\\_of\\_the\\_first\\_LGBT\\_holders\\_of\\_political\\_offices\\_in\\_the\\_United\\_States](http://en.wikipedia.org/wiki/List_of_the_first_LGBT_holders_of_political_offices_in_the_United_States)

<sup>86</sup> <http://www.usatoday.com/story/onpolitics/2013/05/06/jason-collins-gay-michelle-obama-democrats/2138863/>

<sup>87</sup> <http://www.washingtonpost.com/blogs/post-partisan/wp/2013/05/09/obama-and-gay-marriage-one-fabulous-year/>



Enterprise to mislead, deceive and manipulate Tay's Exclusive Name and Likeness and Property:

*"On May 14, 2012, Newsweek dubbed Obama "The First Gay President" because of his stance on marriage equality and other gay rights issues. That seemed about right to me then, and it still does today. What the president did was historic. He showed how the voice of one person can change hearts and minds in many<sup>88</sup>."*

280. Obama, LGBT Organizations and or other Defendants and or RICO Defendants benefitted financially over \$1 billion from the LGBT RICO Enterprise including but not limited to fundraisers, donations<sup>89</sup>, sponsorships, stocks, contracts, joint marketing and other forms of financial contributions to elect him President of the United States in 2012 to continue the LGBT scheme within the Tay Tay Terror Attack through the LGBT RICO Enterprise and other RICO Enterprises described herein using celebrities and other LGBT and Defendant's Representations<sup>90</sup>.

281. On May 18, 2013 Obama used Tay's Exclusive Name and Likeness and Property to entice and induce those similarly situated as he into a scheme similar, and or parallel and or somewhat identical to the Tay Tay Terror Attack while delivering the graduation commencement speech at Morehouse College (Tay's Exclusive Name and Likeness and Property) in Atlanta, GA to mislead and deceive Tay's Exclusive Name and Likeness and Property with his speech that targeted Tay that looked like Tay pursuant to the goals and morals of the Talented 10<sup>th</sup>.

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<sup>88</sup> <http://www.washingtonpost.com/blogs/post-partisan/wp/2013/05/09/obama-and-gay-marriage-one-fabulous-year/>

<sup>89</sup> <http://www.cnn.com/2012/06/05/politics/lgbt-obama-donors>

<sup>90</sup> <http://www.forbes.com/sites/clareoconnor/2012/05/14/inside-obamas-lgbt-donor-machine-how-the-president-will-make-millions-from-gay-marriage-push/>



282. Rap music and the hip hop music culture is a tool used by Defendants and other corporations to sell their products or services by RICO Defendants<sup>91</sup>.

283. The Defendants all took oaths and or affirmations under their respective seals and positions on the HOLY BIBLE to undertake the duties and responsibilities of their respective seals and positions having the duty to protect Tay from harm foreseen. The Defendants breached their oath of office with treason by the acts described in the above and below paragraphs within the Tay Tay Terror Attack.

*e. Falsified drug test for Substitute Teaching*

284. RICO Defendants knew and knows of Tay, his livelihood and his public figure likeness before and after February 10, 2009.

285. While participating in football and track as a student-athlete and or senior 2 sport Letterman [School Board], Tay suffered severe physical damages including but not limited to head trauma (concussions<sup>92</sup>), back damage (disc), ingrown toenails, cramps and charliehorses, dislocated thumb, dislocated hip, and 2 broke ankles. Tay voluntarily signed up to play football in order to compete with other State student athletes for a State Championship to get recognized by colleges as a student – athlete hoping for an offer of full scholarship to attend college and play ball. Tay was forced to participate in the weight training and player development regimen (torture) that the Rockledge High School coaches [School Board] schemed to use Tay's Exclusive Image and Likeness, Name and Likeness and Property to win State Championship(s) through, including but not limited to 2 - a day football practices, Iron Raider summer conditioning and weightlifting, intense and hard

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<sup>91</sup> See also <http://www.forbes.com/sites/lancemadden/2012/12/05/spike-lee-is-still-the-best-nike-jordan-brand-pitchman/>.

<sup>92</sup> Tay had to take eye examinations [Tay's Data Info] in Brevard or the Brevard Eye Center on Merritt Island, FL for sight tests for concussion symptoms. Tay's eyes were diluted as he had to still attend school after being diluted which caused him severe mental and sight damage.



hitting practices in the State's high heat weather index, rain and cold while individually and selectively targeting Tay to quit by singling him out to do specific drills by himself after practice, separating him from team drills to feel non-inclusive, defaming his character by calling him "sorry" and threatening him that he will never play Rockledge High Football, and having players deliberately hit him while mercifully exhausted. Rockledge High [the School Board] induced Tay quit football his Junior year because of the torture and dehumanization in which Rockledge High School [School Board] won their 1<sup>st</sup> FHSAA 3A State Championship<sup>93</sup>. If Tay did not participate in any of the mandatory and or decisional mandatory activities, Tay would not have been able to be on the team with all the privileges and honors that came with participating and completing a full football season. The Defendants and or RICO Defendants benefits, or benefits financially and socially from Tay's likeness within the FHSAA competition or championship series'.

286. Tay began the School Board and State employment application process on February 10, 2009 at School Board's address as the only black male and under 25 years old applicant. Tay paid the School Board a total of \$146.25 for the substitute employment procedure including; \$40.00 for substitute training, \$54.50 for fingerprinting, \$25 for substitute certificate, and \$25 for drug testing at LabCorp administered by Neil Dash.

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<sup>93</sup> RICO Defendants and non-Defendants including but not limited to Nike, Pepsi, McDonald's, FHSAA, Florida State University (FSU), Rockledge, Brevard, the Sunshine Network, the Brevard Yellow Pages, the School Board and the State made profit off Tay's Exclusive Name and Likeness and Property and those similarly situated as he (i.e. Dontavious Wilcox) through the sales of merchandise, concessions, Sunshine Network television recordings of the 2001 and 2002 Florida State 3A Football Championship at Doak Campbell Stadium (FSU), ticket sales, t-shirts, hats, pennants, decals, stickers, and parking. Tay and those similarly situated as he were not paid for play and or winning State sponsored championships and or winning the 2001 FHSAA Sportsmanship Award as a high school student athlete. Tay's Exclusive Name and Likeness and Property and those similarly situated as he attracted prominent colleges and universities including but not limited to Division I and HBCU Division I and or Division II – III institutions to Rockledge High School and Brevard.



287. Tay were forced by the RICO Defendants to get good grades, show good character as a student, to become a student academia or prominent student athlete from K-12 and to pass the FCAT (Florida Comprehensive Assessment Test) in order to graduate from high school and or pass the Scholastic Assessment Test (SAT) or pass the ACT (American College Testing) which are standardized test for high school achievement and college admissions in the United States. Tay could not get into college and or receive financial aid for college to pursuit his Self Made American Dream through the State's K-20 curriculum offered and displayed by the RICO Defendants.

288. Tay was forced into pursuing an (education) at Florida A&M University ("FAMU"), employment and entrepreneurship in the United States and in the State to obtain and acquire his Self Made American Dream through a nefarious trick to take his money and to have him work hard to become a "Hidden Slave" through the trafficking, forced labor, peonage and the enticement into employment, entrepreneurship, education and the Tay Tay Terror Attack through the sale into involuntary servitude by unlawful conduct and unfair trade practices by official writings and certificates by tampering with Tay's property (Tay's Exclusive Name and Likeness and Property).

*f. Denial of Employment and Education*

289. The Florida Department of Education [State] and Microsoft have been collecting staff and student-level data from the state's 67 school districts... [School Board], including student demographics, courses taken and completed, attendance, transcripts, and more. The State maintains a similar database for its State college system<sup>94</sup>. In 2007, after a lengthy pilot, the FDOE turned to Microsoft Services for help in building the reporting, identity, and security infrastructure for Sunshine Connections. The FDOE decided to upgrade Sunshine

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<sup>94</sup> See [http://www.microsoft.com/casestudies/Case\\_Study\\_Detail.aspx?casestudyid=4000004482](http://www.microsoft.com/casestudies/Case_Study_Detail.aspx?casestudyid=4000004482).



Connections to Microsoft Office SharePoint Server 2007 and use that software's business intelligence (BI) capabilities as the site's reporting foundation. ("Defendants meeting of the minds")

290. Since 2003, Microsoft and its employees have provided more than \$38.8 million in cash and software to State community organizations, schools, and human-service agencies to initialize the Tay Tay Terror Attack on, before and after March 5, 2009 to benefit substantially from Tay's Name and Likeness and data information.

291. The RICO Defendants agreed with Microsoft and other companies during, before and or after March 5, 2009 for the purchase of license to operate its computer applications including but not limited to Windows 98, Windows XP, Microsoft Office Suite, or Microsoft's Enrollment for Education Solutions (EES), Microsoft Office SharePoint Server 2007, Microsoft Services, Microsoft Forefront Security for SharePoint, Microsoft Office Performance point Server 2007, Microsoft Identity Lifecycle Manager 2007 Feature Pack 1, Microsoft SQL Server 2005, Windows Server 2008, Microsoft Active Directory Domain Services, Active Directory Federation Services, Microsoft SQL Server 2005 Analysis Services, Microsoft SQL Server 2000 Reporting Services under FL. Administrative Code 6A-1.012(9) in association with companies such as Dell Computer Marketing L.P., Gov Connection, Inc. and SHI International Corporation. ("Defendants meeting of the minds")

292. Defendants and or RICO Defendants promoted and or were fiducially responsible for the promotion of an Equal Employment Opportunity and a quality livelihood and education in the State through research and experimentation of Tay Tay Terror Attack in more effective utilization of television, radio, motion pictures and related to media for educational purposes; advertisements of billboards, partnerships, television, websites, employees, students, student



– athletes, educators, career professions, events and any and all other communications of advertising and marketing of education, employment, entrepreneurship, safe and exclusive environments and exclusive living in Cocoa, Brevard County; “*Florida’s Space Coast*” and the State of Florida including but not limited to:

- a. School Board launched BPS – TV in September 2004 on Bright House Networks cable TV. School Board partners with BCC to base operations of BPS – TV at WBCC – TV in Cocoa. WBCC-TV also broadcasts BPS – TV on one of their four digital TV channels, which makes the channel available to anyone who has a digital TV antenna. School Board and BCC have been working under a contract before and after March 5, 2009 where BCC produces and televises the School Board meetings and also provides operational assistance, office space, production studios and educational programming to BPS-TV, the School Board TV channel. BCC is also donating productions service hours to the School Board to assist with the creation of local programming. This agreement and arrangement [Defendants meeting of the minds] were agreed between former School Board Superintendent, Dr. Richard DiPatri, Wes Sunner, the Director of District Communications and Scott Carrico, TV Station manager.
- b. The State agreed with Sunshine Network around November 1, 2000 for exclusive rights to televise all FHSAA State Championship games also referred to as the “Dodge Florida High School Championship Series”, including but not limited to football and the 2001 and 2002 Rockledge High School State Championship games that Tay was part of as a student and or student-athlete while reaching





about 5.2 million households statewide as the nations former 4<sup>th</sup> largest regional sports network.

293. On October 2, 2008, Tay, as a Mayor of Cocoa candidate sent an email to School Board, Brevard and State employees and other campaign candidates on his initiatives of education, employment and entrepreneurship from his flanative\_03@hotmail.com and or smith4cocoamayor@live.com email address, a couple of School Board and State employees replied to Tay's email.

294. On January 23, 2009, Tay, as a public figure, then emailed the School Board, particularly Jim Kaczowski ("Jim") at kaczkowj@brevard.k12.fl.us for procedures to apply for employment as a substitute teacher with the School Board and State RICO Defendants. Tay used his flanative\_03@hotmail.com and or smith4cocoamayor@live.com email address as his contact email on any and all of his Employment Applications for the School Board, all which was accessed through the School Board's Microsoft Outlook and IT Department or the Microsoft Windows Operating System. Jim never replied to Tay's email. Tay's emails to School Board and State officials and or employees are pursuant to Fl. Stat. Chapter 119, 257 and 282, and Rules 1B-24 and 60DD-2 of the Florida Administrative Code by Candice Crawford, former Secretary of State.

295. Sometime before and or around February 9, 2009 RICO Defendants knew of and should've known of Tay's Data Info, his Exclusive Image and Likeness, Name and Likeness and Property by and through the Tay Tay Terror Attack; his K-20 State education curriculum [K-20 Education Surveillance], local newspapers, Search Engines, and the intentional Tay Tay Terror Attack. As a substitute teacher applicant around and after February 10, 2009, Tay was forced by School Board and State RICO Defendants to give fingerprinting for a



background check, and voluntarily give his Data Info while having received 'HIGH' recommendations from most Rockledge High School [School Board] principals and or School Board employees such as Terri Kulaga Greene, Loretta Bosley-James and Blair Nave, who have taught, disciplined and educated Tay. Tay's Name and Likeness were known by the School Board and State RICO Defendants as a Highly Qualified (20 USC § 1021 (13)) and Highly Competent (20 USC § 1021(12)) teacher and or Exemplary Teacher (20 USC § 1021(8)) knowing Tay was Highly Qualified and Highly Competent of becoming a Exemplary Teacher pursuant to 20 USC § 1021(8)(12)(13) as a Beginning Teacher pursuant to 20 USC § 7801(3) from Florida A&M University (FAMU) (20 USC 7801(24) Institution of Higher Education).

296. Tay began the RICO Defendants official employment procedure on February 10, 2009 at School Board's place of business as the only black male and black male under 30 applicant to become a substitute teacher. Tay paid the School Board a total of \$146.25 for the substitute employment procedure by Western Union money orders and a personal check, including; \$40.00 for substitute training, \$54.50 for fingerprinting, \$25 for substitute certificate, and \$25 for drug testing at LabCorp administered by Neil Dash [School Board and State RICO Defendants]. Therefore making financial transactions with monetary instruments pursuant to 18 USC § 1956(c)(4)(5). RICO Defendant deposited those funds in financial institutions pursuant to 18 USC § 1956(c)(6) to extort and launder "Dirty Money"<sup>95</sup> from the Tay Tay Terror Attack.

297. Tay made all of his money orders from Western Union and or checks payable to the School Board or Brevard Public Schools for his employment procedure. The Defendants sold

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<sup>95</sup> Money laundering is the process of making illegally-gained proceeds (i.e. "dirty money") appear legal (i.e. "clean").



Tay's Exclusive Name and Likeness and Property to RICO Defendants to conduct, transport, harbor and or traffic his drug test analysis, results and Data Info through the State's Chain of Custody form for profit in monetary transactions.

298. On February 23, 2009 at approximately 11 a.m. at LabCorp – FLD 53 Merritt Island laboratories, Tay took his Chain of Custody form to LabCorp from the School Board and State RICO Defendants to conduct his drug test. Tay was drinking Lipton's Green Tea with Citrus to help him urinate while in the waiting room. Tay took his drug tests which were administered by an unknown LabCorp employee. Tay's urine were then received and transported by LCA Courier Service to Neil Dash for inspection.
299. Tay's Exclusive Name and Likeness and Property were released to LCA Courier and trafficked and delivered Tay's Exclusive Name and Likeness and Property from LabCorp and Neil Dash through the School Board and the State's Chain of Custody procedures to Brevard in and for Brevard. Brevard is contracted with the School Board as the Custodian of Records for School Board urine testing results pursuant to Fl. Stat. 125.0101(2) and (3).
300. Neil Dash emailed the School Board Tay's alleged drug test stating that Tay's urinalysis was detected with marijuana metabolites via the School Board's IT Department and Microsoft Outlook. Tay and his Data Info were trafficked through wires and computers to participate in the Tay Tay Terror Attack.
301. Tay signed and agreed to School Board and State RICO Defendants terms and agreements including but not limited to Direct Deposit Authorization with National City Bank, an Application for a District Issued Substitute Certificate with a local check or money order for \$25.00 made out to the School Board, his Social Security card and a valid Florida driver's license, an IRS W-4 form, or an I-9 for ethnicity information, or Medical History



form, or Internet Acceptable Use form, retirement form, School Profile and home school form, and fingerprinting \$54.50 and agreed to be compensated \$8.75/hr with a valid Associates of Arts degree from FAMU. Tay's Data Info was knowingly inserted into Dell Computers and the Microsoft Operating System database by the School Board.

302. The March 5, 2009 Document<sup>96</sup>; was the declared act of war through domestic terrorism:

18 USC § 2331 dated February 9, 2009 stating that Tay did not comply with School Board policy 4124 because of positive drug screen results that he participated in on February 24, 2009. This Document was signed in blue ball point pen by and/or on behalf of the School Board's Deputy Superintendent, Leroy A. Berry without any attached initial<sup>97</sup> and or confirmed<sup>98</sup> results pursuant to FL. Stat. 112.0455 with a reference to a personnel file as codified in FL. Stat. 1012.31(2)(c)(1) and (4) that allegedly Tay does not have pursuant to 18 USC § 1001, §1002, §1018, §1035, §1341, §1347 pursuant to the health care benefit of Tay's drug test and chain of custody as codified in FL. Stat. 112. 0455, §1589(a)(4). ("Defendants meeting of the minds")

303. The School Board submitted a false drug analysis to Leroy Berry stating that Tay

"participated and failed in a drug analysis on February 24, 2009," yet documenting in the

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<sup>96</sup> including but not limited to, any printed, typewritten, uncoded, photocopied, photographed, recorded or handwritten matter of whatever character from the School Board denying Tay employment as a substitute teacher based on an employment hoax using the Microsoft Operating System.

<sup>97</sup> Initial "Drug Test" - means a sensitive, rapid, and reliable procedure to identify negative and presumptive positive specimens, using an immunoassay procedure or an equivalent, or a more accurate scientifically accepted method approved by the U.S. Food & Drug Administration or the Agency for Health Care Administration as such more accurate technology becomes available in a cost-effective form.

<sup>98</sup> "Confirmation/Confirmed Drug Test" - means a second analytical procedure used to identify the presence of a specific drug or metabolite in a specimen, which test must be different in scientific principle from that of the initial test procedure and must be capable of providing requisite specificity, sensitivity, and quantitative accuracy. All specimens identified as positive on the initial tests shall be confirmed using a second test, a gas chromatography/mass spectrometry (GC/MS) test or an equivalent or more accurate scientifically accepted method approved by the Agency for Health Care Administration or the U.S. FDA as such technology becomes available in a cost-effective form.



Custodian of Records the Medical Review Officers' drug analysis as taking the drug analysis on February 23, 2009 and because of marijuana metabolites he failed.

304. The March 5, 2009 Document was to deprive Tay access to his share of the School Board's approximately \$4.2 million substitute budget and the enjoyment of teaching and encouraging students in Brevard than they do white substitute teachers<sup>99</sup> that are male and or female.

305. The Florida Board of Education [State] Rule 6A-1.0012, Florida Administrative Code (FAC), authorizes the District to make electronic funds transfers (EFTs) and or exchange transfer funds (ETF's) provided adequate internal control measures are established and maintained, such as a written agreement with a financial institution. An agreement must, among other things, contain the title of the bank account subject to the agreements and the manual signatures of the Board chair, superintendent, and employees authorized to initiate EFTs. ("Defendants meeting of the minds")

306. Defendant and RICO Defendants regularly used EFTs to make electronic disbursements for vendor payments, purchasing card payments, debt service payments, purchases and sales of investments, and direct deposit of employee pay and other payroll related activity using Tay's money purchased for an equal employment opportunity.

307. Tay had an option to have his specimen retested by Neil Dash or the "Medical Review Officer at Doctor's Review" at his own expense in check form for \$125.00. Tay did not have his specimen retested due to the fact that he was not provided the due process and equal protection of his first urinary test from the School Board, Neil Dash, LabCorp and the State.

308. On the date of March 6, 2009, Tay then contacted the School Board [Leroy Berry's office] to discuss the results of his urinary testing and the March 5, 2009 Document. He then

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<sup>99</sup> See <http://spacecoastdaily.com/2012/04/substitutes-no-longer-a-stop-gap-measure-for-educators/>.



spoke with his assistant (name unknown) who told him to contact the 1-800 “Medical Examiner at Doctors Review” number located in the last paragraph of the “Letter of Failure/Rejection” to get those medical records, because they (the School Board) could not discuss, nor provide those results. Tay then contacted Medical Examiner at Doctors Review to view, and/or receive actual medical records of alleged failed drug screen, Medical Examiner at Doctors Review examiner “Dr. Michel” told him that results of the urinary testing came back “UNCLEAR” for marijuana traits and to contact employer for actual medical records concerning the drug screen.

309.      Around the date of March 9, 2009, Tay contacted the School Board’s Human Resources department and Kathy Krell for medical records resulting that he tested positive for marijuana. The School Board could not and did not release those records, due to them not possessing any legitimate records of having an “UNCLEAR” urinary substance in Tay’s urinary testing on February 24, 2009. He was then told by the School Board’s Human Resources department that “we don’t have those results.” “When you take your drug test, the medical examiner contacts us stating if your sample comes back clear or unclear. Yours was unclear, so we sent you a letter stating that you failed your drug screen.”

310.      Pursuant Fl. Stat. 112. 0455(6)(b)(7), 112.0455(8) [Notice to Employees] and Fl. Stat. 440.012(3) [Notice to employees and Job Applicants] to the reporting of Tay’s drug test results **or** Chain of Custody form from the RICO Defendants; 1. The laboratory [LabCorp] shall report test results to the MRO [Neil Dash] within seven working days after receipt of the specimen by the laboratory. 2. LabCorp shall report as negative to the MRO all specimens which are negative on the initial test or negative on the confirmation test. Only specimens which are confirmed as positive on the confirmation test shall be reported positive



to an MRO for a specific drug. 3. LabCorp shall transmit results to the MRO in a manner designed to ensure confidentiality of the information. LabCorp and MRO must ensure the security of the data transmission and restrict access to any data transmission, storage and retrieval system. 4. The MRO may request from LabCorp, and LabCorp shall provide, quantification of test results. The MRO shall evaluate the drug test result(s), which is reported out by LabCorp, to verify by checking the chain of custody form that the specimen was collected, transported, and analyzed under proper procedures, and to determine if any alternative medical explanation caused a positive test result. The MRO shall review all medical records made available by the tested individual. 5. Upon verifying a negative test result, the MRO is required to retain the chain of custody forms confidentially for five years. 6. Within three days of the receipt of a positive test result from LabCorp, the MRO is required to notify the employee or applicant and to inquire as to whether prescriptive or over-the-counter medication could have caused the positive result. The individual has five days after notification to submit documentation of any prescriptions relevant to the positive test result and discuss the test result with the MRO. 10 (a) If the MRO is unable to contact a positively tested donor within three days of the receipt of the test results from LabCorp the MRO must contact the employer and request the employer to direct the donor to contact the MRO as soon as possible. If the donor does not contact the MRO within two days following the request, the MRO will verify the test result as positive. (b) The MRO may change the verification upon a showing of good cause by the donor as to why contact could not be made within two days only if the donor also presents information concerning a legitimate explanation for the positive test results. 7. Upon verifying a positive test result, the MRO must notify the employer in writing and retain the chain of custody forms confidentially for



spoke with his assistant (name unknown) who told him to contact the 1-800 “Medical Examiner at Doctors Review” number located in the last paragraph of the “Letter of Failure/Rejection” to get those medical records, because they (the School Board) could not discuss, nor provide those results. Tay then contacted Medical Examiner at Doctors Review to view, and/or receive actual medical records of alleged failed drug screen, Medical Examiner at Doctors Review examiner “Dr. Michel” told him that results of the urinary testing came back “UNCLEAR” for marijuana traits and to contact employer for actual medical records concerning the drug screen.

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to an MRO for a specific drug. 3. LabCorp shall transmit results to the MRO in a manner designed to ensure confidentiality of the information. LabCorp and MRO must ensure the security of the data transmission and restrict access to any data transmission, storage and retrieval system. 4. The MRO may request from LabCorp, and LabCorp shall provide, quantification of test results. The MRO shall evaluate the drug test result(s), which is reported out by LabCorp, to verify by checking the chain of custody form that the specimen was collected, transported, and analyzed under proper procedures, and to determine if any alternative medical explanation caused a positive test result. The MRO shall review all medical records made available by the tested individual. 5. Upon verifying a negative test result, the MRO is required to retain the chain of custody forms confidentially for five years. 6. Within three days of the receipt of a positive test result from LabCorp, the MRO is required to notify the employee or applicant and to inquire as to whether prescriptive or over-the-counter medication could have caused the positive result. The individual has five days after notification to submit documentation of any prescriptions relevant to the positive test result and discuss the test result with the MRO. 10 (a) If the MRO is unable to contact a positively tested donor within three days of the receipt of the test results from LabCorp the MRO must contact the employer and request the employer to direct the donor to contact the MRO as soon as possible. If the donor does not contact the MRO within two days following the request, the MRO will verify the test result as positive. (b) The MRO may change the verification upon a showing of good cause by the donor as to why contact could not be made within two days only if the donor also presents information concerning a legitimate explanation for the positive test results. 7. Upon verifying a positive test result, the MRO must notify the employer in writing and retain the chain of custody forms confidentially for



five years. 8. If the MRO determines that there is a legitimate medical explanation for the positive test result, the MRO must report a negative test result to the employer. However, in circumstances where the MRO believes that the legal use of a drug(s) would endanger the individual or others, or if the individual is in a safety sensitive or special risk position, the MRO must report the result as negative due to a validated prescription and must request that the individual be placed in a position which would not threaten the safety of the individual or others. 9. The MRO may order a re-analysis of the original sample at any licensed laboratory licensed under Chapter 10E-18, Florida Administrative Code. 10. Unless otherwise instructed by the employer [School Board] in writing, all records pertaining to a given specimen shall be retained by the drug testing laboratory for a minimum of two years. 11. The MRO is the Medical Review Officer of the Doctors Review Service- (LabCorp) Neil Dash.

311. Neil Dash<sup>100</sup> are obligated under Fl. Stat. 112.0455 to contact the specimen donor should the results of the laboratory tests for the specimen identified by the chain of custody form be confirmed positive, Neil Dash and or School Board and State RICO Enterprise would contact the donor. Tay's results confirmed positive and was not contacted by LabCorp and or School Board and or Neil Dash. Even though Tay's analysis did not result in prescribed or over the counter drugs, his results still allegedly came back positive and was still not contacted by RICO Defendants.

312. The Tay Tay Terror Attack forced Tay to take a mandatory drug test [FL. Stat.

440.102(e)(i)] with the RICO Defendants that was conspired against him to fail without

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<sup>100</sup>“Medical Review Officer or MRO” - means a licensed physician, employed or contracted with an employer, who has knowledge of substance abuse disorders, laboratory testing procedures, and chain of custody collection procedures; who verifies positive, confirmed test results, and who has the necessary medical training to interpret and evaluate an employee's positive test result in relation to the employee's medical history or any other relevant biomedical information. The School Board's MRO is Dr. Neil J. Dash, 546 Franklin Ave, Massapequa, NY 11758; phone 800-343-1222. Pursuant to the drug-free workplace program under Florida's Workers' Compensation Law, Section 440.102, Florida Statutes.



notice of a Drug Rehabilitation Program [FL. Stat. 440.102(d)] through an ‘employment hoax’ yet having no legal duty to drug test him pursuant to FL. Stat. 112.0455(4) on, before and after February 9, 2008. (“Defendants meeting of the minds”)

313. The RICO Defendants and any officers and or agencies affiliated with Tay’s Feb. 23, 2009 drug test analysis failed to contact and notify Tay that his identified specimen was allegedly confirmed positive for marijuana metabolites<sup>101</sup>.

314. The School Board’s Drug and Alcohol Manager, Kathy Krell, submitted a false drug analysis to Leroy Berry stating that Tay “participated and failed in a drug analysis on February 24, 2009,” yet documenting in the Custodian of Records the Medical Review Officers’ drug analysis as taking the drug analysis on February 23, 2009 and because of marijuana metabolites he failed. This was not a typographical error due the Microsoft automatic date insertion application within the School Board’s Microsoft programs or applications for documents such as the March 5, 2009 Document<sup>102</sup>.

315. Microsoft’s software and hardware through the License and Contract Agreements should and could have prevented this scheme by Microsoft’s auto format options in its Word application. Microsoft’s software and hardware produced the March 5, 2009 Document by

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<sup>101</sup> Section 5 of the chain of custody order form signed by Tay in witness of the State of Florida, Brevard Public Schools, LabCorp FLD 53 and Laboratory Corporation of America, Dr. Neil J, Dash and the LabCorp FLD 53 unnamed employee on August 23, 2009 at approximately 11:06 a.m. in Merritt Island, FL.

<sup>102</sup> There are only 28 days in the month of February; the document was intentionally prepared one day before Tay engaged in the School Board and State RICO Defendants knowingly, mandatory and required applicant procedures. The School Board had already disbursed the document on March 4, 2009, and therefore could not have been viewed as a “clerical or typographical error” due to February 9, 2009 not being at that particular moment “present” time to notify Tay of his employment status. The School Board and RICO Defendants knew and/or know of Tay and his swagger before, during and after contact with them in October, 2008 and January, 2009 during his K-20 School Board and State education curriculums wherefore engaged in “target discrimination” to deny Tay employment as a substitute teacher. (“K-20 Education Surveillance”)



and through its Sunshine Connections agreement with the State, and other licensing agreements with the School Board, Dell, SHI and Gov Connection.

316. The School Board's March 5, 2009 Document and employment procedure concerning Tay's personal and medical information<sup>103</sup> ["Data Info"] as defined in FL. Stat. 1012.31 (3)(a)(5) and livelihood was Tay Tay Terror Attack to return and or place Tay in peonage through the Tay Tay Terror Attack scheme providing custodial services to traffic Tay's Exclusive Name and Likeness with the School Board and the State as codified in Fl. Stat. 125.0101(3). RICO Defendants cannot claim to be accountable to the public if it cannot provide basic true and accurate information as codified in FL. Stat. 1008.31 (Florida K-20 Education Performance Accountability System).
317. The Defendants and or RICO Defendants knew the importance of employment, education, and health care matters related to employment in public education ("relevant market"), and the importance of Tay's livelihood (20 USC § 1087ii – Low Income Communities and 42 USC § 9902(2) – Poverty Line) [hereinafter, "Tay's livelihood"] to intentionally and fraudulently disqualify him from the RICO Defendants educator employment as codified in Fl. Stat. 1012.315 and Fl. Stat. 1012.34 in the denial of his educator certificate (pursuant to Fl. Stat. 1012. 56(12)) and educator benefits (pursuant to Fl. Stat. 1012.71(F)).
318. The Defendants and or RICO Defendants "knew their action was likely to affect the judicial proceeding," or there would be no reason or incentive for the Defendants and or RICO Defendants to conspire to conceal, hide or make unavailable, or endeavor to conceal, hide, or make unavailable Tay's evidence. (*Aguillar*, 515 US at 599, 115 S. Ct. 2357. Wherefore the RICO Defendants acted with requisite knowledge and corrupt purpose to

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<sup>103</sup> Cannabis - (marijuana, hashish, maryjane, grass, reefer, pot, dope, ganja, etc.)



violate Title 18 Section 1505, 1515(3) and 1518. “[It is not necessary that the Defendants succeed in obstructing justice only that they endeavored to do so, or in a manner that is likely to do so.]” *Aguilar* 515 US at 601-02, 115 S. Ct. 2357, *United States v. Breason*, 104 F. 3d 1267, 1284 (11 Cir. 1997); *US v. Aragon*, 983 F. 2d. 1306, 1315 (4 Cir. 1993).

319. On about March 5, 2010 [“Tay Tay Terror Attack”] Tay received a copy of the School Board’s AIG \$2 million insurance coverage agreement for claims of negligence amongst other things from the School. Then offered a \$50 settlement on February 2, 2010 in the Sham 2009 Litigation.

320. The Defendants and or RICO Defendants knew or should’ve known that Tay was denied employment based upon an employment hoax by the Defendants and or RICO Defendants pursuant to School Board and AIG’s agreement in the AIG Domestic Claims General Litigation Management Guidelines and AIG’s litigation Management Program<sup>104</sup>.

321. The March 5, 2009 Document and or the Tay Tay Terror Attack and trick were an act of intentional infliction of emotional distress and intentional discrimination in damages of employment of Tay’s Exclusive Name and Likeness and Property. This intentional negligence, and or fraud and terrorist torture acts were foreseeable and could have been prevented by the Defendants and or RICO Defendants on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

322. On, before and after February 9, 2009 the Defendants and or RICO Defendants used and or uses Section 215 of the PATRIOT Act<sup>105</sup> pursuant to 18 USC § 7701(a)(1) (“Email

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<sup>104</sup>Generally pursuant to the entire policy and wherefore exclusively within the litigation Management Program Section III – The Agreed – To Litigation Plan: Case Management, Resolution Strategy, Case Management, Budget; Section IV – Communications; Section V – Case Management; G. Settlement Activity [hereinafter, “3-5-365 Terror Attack” and or “Tay Tay Terror Attack”].

<sup>105</sup> Section 215 allows for secret court orders to collect “tangible things” that could be relevant to a government investigation – a far lower threshold and more expansive reach than a warrant based on



Fraud”) within the herein the Tay Tay Terror Attack and or RICO Enterprise in support of the Sunshine Collection “sensitive collection program” (Tay Tay Terror Attack) that has or may have targeted Tay.

323. Defendants and or RICO Defendants engaged in a nefarious scheme, forcing Tay to indulge in a mandatory drug test for employment with the School Board. On March 5, 2009 School Board sent Tay a letter of rejection with known falsified information such as he failing a drug test on February 24, 2009 [the “March 5, 2009 Document”] when in actuality Tay took his drug test on February 23, 2009, which caused Tay severe damages on, before and after February 9, 2009 including but not limited to being a Athletic Coach.
324. The Defendants and or RICO Defendants actions on, before and after February 9, 2009 pursuant to the March 5, 2009 constitute violation of The Code of Ethics for Public Officers Employees Ch. 112 – Misuse of Public Position, as well as common law negligence and breach of contract as codified in FL. Stat. 440.102(2)-(10), and 440.125. Tay seeks damages suffered as a result of the Defendants and or RICO Defendant’s Tay Tay Terror Attack practices including but not limited to statutory, general and special damages.
325. The Defendants and or RICO Defendants have not given Tay the due process and equal protections as an equal opportunity employer and have benefitted substantially financially, as a brand, individually and cohesively through this nefarious scheme against Tay to place and or return him to poverty.
326. The Defendants and or RICO Defendants were the Mastermind’s of the Defendants

Scheme and confidence trick through their relationships to intentionally discriminate against

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probable cause. The list of possible “tangible things” the government can obtain is seemingly limitless, and could include everything from driver’s license records to Internet browsing patterns. Section 215 has been used to obtain driver’s license records, hotel records, car rental records, apartment leasing records, credit card records, and the like.



Tay and deprive him and them of an Equal Employment Opportunity for employment as a “substitute” teacher with the School Board and State. The Defendants corruptly used [their] positions to unlawfully perform in official duties to intentionally<sup>106</sup>, with malice, neglect to provide Tay an Equal Employer Opportunity through the *Tay Tay Terror Attack*.

327. Around June 14, 2011, Leroy Berry resigned and or retired from the School Board to receive extorted funds from Tay to receive retirement pensions from the State and or the USDOE after operating a fraud and employment hoax to Tay.

328. Around August 5, 2011, the School Board was awarded the Meritorious Budget Award by the Association of School Business Officials and the Distinguished Budget Presentation Award by the Government Finance Officers Association for achieving the highest standards of governmental budgeting.

329. Tay cannot qualify for particular jobs that require him to have a certificate in teaching, and or higher education, and or have transportation to travel, and that requires him to take a drug test due to his religious marijuana use, and or pay cruise agencies to find him employment on a cruise ship due to the intentional and inflicting damages in the Tay Tay Terror Attack.

330. The Defendants and or RICO Defendants participated in the Tay Tay Terror Attack so that Tay would potentially be permanently deprived of the enjoyment of life in which he would be a tainted public figure viewed as an exclusive educated “Dope Boy” from Cocoa, to

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<sup>106</sup> Pursuant to FL. Stat. 112. 0455(8) (i) Within 5 working days after receipt of a positive confirmed test result from the testing laboratory, an employer shall inform an employee or job applicant in writing of such positive test result, the consequences of such results, and the options available to the employee or job applicant. (j) The employer shall provide to the employee or job applicant, upon request, a copy of the test results.



return him to the ‘*Trap*<sup>107</sup>, in which he came from resetting his life sometime well before February 9, 2009, on March 5, 2012 by and through the March 5, 2009 and the Tay Tay Terror Attack.

*c. Denial of Post Secondary Education*

331. Tay believed that by indulging in higher education and legitimate entrepreneurship; leading, serving, and educating the public (through private and public projects), his Name and Likeness would be a great asset for future educators by evolving the education system for the beautiful city of Cocoa, FL, Brevard County, FL, the State, the USA; and the Nation itself to attract more modern, qualified African American and other racial minority male educators who can relate to tomorrow’s educational approach to students technological lifestyles and learning patterns by personally illustrating a civil, fun, discipline and effectively GREAT learning environment, so that the initiatives and priorities of Obama and the Secretary of Education<sup>108</sup> (USDOE) including the STEM program can be “effectively” implemented.

332. Tay pursued brand marketing ventures with fortune 500 companies without the proper patents because of his unemployment and was denied employment with those companies due to his deeply rooted “Florida Dope Boy” and *Tay Tay Terror Attack* background in Brevard and through Search Engines, and the unavailable patents for his ideas.

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<sup>107</sup> “*Trap Muzik*” (T.I. (2003.)); so that Tay could follow a blueprint to be a lucrative African American male citizen to either get caught up in some governmental-judicial trap to be deprived of life and opportunity. Also serving as a double meaning, also referring to the half court trap (aka press) defense used in basketball. (i.e. “*Education v. Drugs v. Entertainment*”) See also <http://rapgenius.com/Wale-georgetown-press-lyrics#note-1345965>.

<sup>108</sup> (i.e. Investing in Innovation, [American Jobs Act](#), [Promise Neighborhoods](#), [Race to the Top Fund](#), [TEACH Campaign \(teach.gov\)](#), [White House Initiatives](#), [Start Up America](#), [Rural Education](#), [Help for Haiti](#) [Indian Education Initiative](#) [Let's Move](#) [Financial Literacy](#), [Early Learning](#) , etc.)





333. After the March 5, 2009 Document, Tay was denied and or ‘black balled’ joint marketing projects meaning and knowingly by Tropicana – Pepsi, Nike, U.S. Polo Association, WM Wringley, Jiffy Milling Co., E&J Gallo, the Miami Dolphins, Miller – Coors, the Weyco Group, Proctor and Gamble worth about \$365 million in intellectual property, stocks and service fees for each potential project because he could not afford patents and because Tay’s Exclusive Name and Likeness and Property were defamed through the internet and through false public records of Tay’s Exclusive Name and Likeness and Property in Brevard County through the Tay Tay 321 Terror Attack.

334. Tay was denied employment at Lowe’s as Season and Garden Representative, JP Morgan Chase in Melbourne, FL as an Account Agent, Royal Caribbean for about 3-6 positions in Florida and other available positions in Brevard County because he is on food stamps and a black male from Cocoa under 30 years old.

335. On and around November 4, 2011 Tay was attempting to enroll at Everest University as a undergraduate Paralegal student. Tay submitted his FAFSA to Federal Student Aid and was

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334. Tay was denied employment at Lowe's as Season and Garden Representative, JP Morgan Chase in Melbourne, FL as an Account Agent, Royal Caribbean for about 3-6 positions in Florida and other available positions in Brevard County because he is on food stamps and a black male from Cocoa under 30 years old.
335. On and around November 4, 2011 Tay was attempting to enroll at Everest University as a undergraduate Paralegal student. Tay submitted his FAFSA to Federal Student Aid and was confirmed by the USDOE with confirmation number: F 03703516809 and a Date Release Number (DRN): 2153 to be eligible to receive the Direct Stafford Loan estimated at about \$20, 500, and other federal, state, or institutional grants, scholarships, and/or work study.
336. Tay was enticed by the recruitment, the benefits of having an education in the area of law and the target marketing of education opportunities in law without going to law school. If Tay did not apply to enroll in college and submit a FAFSA application to the United States including but not limited to his social security number, name, address, and birthday, he could not be eligible to receive financial aid to fully pay and or assist in paying for Tay's education at Everest University.



337. Tay was denied education as a Paralegal major at Everest University because he was bamboozled about receiving financial aid to enroll from the U.S. Department of Education due to a defaulted financial background at Florida A&M University. At about 18:25:26 (7:25 p.m) on November 4, 2011, he was eligible to probably receive an estimate \$20.5 k from the Direct Stafford Loan from their website. But due to a remaining balance at FAMU and through the U.S. Department of Education, he could not qualify for those funds and was not fully admitted into the university and was once again DENIED access to education due to his educational financial background and because he was below the 135% federal poverty line, wherefore engaging in a paralegal education scheme ["Paralegal Scheme"] on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

338. USDOE Secretary Arne Duncan told Essence Magazine that the demand for black male teachers is extremely needed, and that he would visit HBCU's to recruit black males to teach.<sup>109</sup>

#### *4. The United States Private Tutoring Scheme*

339. In former President, George W. Bush's No Child Left Behind law: The use of public money to pay for private tutoring for poor students attending failing public schools. The federally funded program in the State has such tax regulation that it enables criminals, cheaters and profiteers to collect millions in taxpayer dollars without even proving they helped a single student learn.

340. It's a nearly \$1 billion-a-year federal program aimed at helping the poorest of kids achieve academic dreams in the United States and the State.

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<sup>109</sup> See <http://www.essence.com/2010/07/06/more-black-male-teachers-needed/> and <http://www.essence.com/2010/03/01/arne-duncan-education-reform/>



341. The State has spent around \$192 million on private-tutoring firms in the past two years. The companies are paid at a dramatically higher rate than conventional public schools. In the 2009-10 school year, the most recent period for which numbers are available, the State spent \$9,981 per student — about \$11 an hour. The State spent \$58 an hour, more than five times as much, on tutoring<sup>110</sup>.

342. The United States and the State's goal of the tutoring scheme was to mislead and defraud Tay's Exclusive Name and Likeness and Property by way of the Tay Tay Terror Attack in being a State private and contracted tutor using his Property that was converted from his School Board and State RICO Enterprise; substitute employment scam to pay him his ADC salary, and let the federal funds for poor students flow straight to the State's 67 school districts — that already are accountable for their spending — to decide the best way to serve them, which might still include private tutoring.

343. On behalf of the Defendants and or RICO Defendants collectively, socially and morally including but not limited to Obama, the State and its public school system, the School Board, Neil Dash, Microsoft and LabCorp owed Tay duties of care, safety, integrity, honesty and a right to inform Tay about an alleged failed drug test pursuant to the Drug Free Workplace Act of Florida, FL. Stat. 112.0455. Tay had an option to have his specimen retested by the "Medical Review Officer at Doctor's Review" at his own expense in check form for \$125.00. He did not have his specimen retested due to the fact that he was not provided the due process of his first urinary test, nor did he have the funds.

344. NASA is used by the School Board and State as a key tourist attraction and worldwide landmark as a representation of the space program, technology, the "Future of Florida's Space Coast", education and economic development in, for and on behalf of Cocoa, the

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<sup>110</sup> <http://educationviews.org/tutoring-firms-cash-in-on-florida-kids/>



School Board, Brevard, the State, Obama and the future of the world in which Tay relied to become a likewise representation. As a former participant of the NASA Exploration program, Tay felt NASA and the School Board would provide him an opportunity to become successful through their likeness.

*5. Florida Tutoring Scheme*

345. The State and United States offer free tutoring programs to disadvantaged students or low income family students by and through the Federal Title I education funding allocation.

The programs works as follows:

1st – After parents have selected ADC *and* or any other private tutoring company and the school district has notified us of the students that are approved to receive our services, we consult with the parents and the school concerning the needs of the students.

2nd - We conduct the ADC *and* or any other private tutoring company diagnostic assessment, which is simple, but elegant. It allows us to accurately determine a placement level and the specific skill gaps of each student.

3rd - We make a placement for each student and provide a full set of lesson plans, curriculum, and a host of extensions and enrichment activities to meet the needs of each student.

4th - Each ADC *and* or any other private tutoring company tutor are assigned a group (typically 4 - 8) of students with which to work. Each student is given abundant personal instruction and attention as they are guided through the program. The ADC and or *A+ Markem and* or any other private tutoring company instructional model facilitate differentiation to meet the individual needs of each student.

5th - ADC *and* or any other private tutoring company maintain communication with the parents and the school regarding progress.

6th - Finally ADC and or any other private tutoring company conduct a post-assessment from students to confirm progress.

346. Students typically attend two 90-minute sessions per week. ADC and or any other private tutoring company require a minimum of two one-hour sessions per week.



347. The total number of sessions is controlled by the Federal Title I funding allocation. This usually provides for 25-30 hours of service (i.e. approximately twenty 90-minute tutoring sessions). The objective is to help every student improve his or her reading or math skills to be more successful in the classroom and on the FCAT.
348. Shortly before September 28, 2009, Tay met Thomas Owens, a Tutoring Coordinator for ADC Tutoring Corp<sup>111</sup> at McNair Magnet School. He and Thomas met about possible employment as a sub-contracting tutor (educator) pursuant to 20 USC § 6319(c) (Qualifications of teacher and paraprofessionals). Tay received notice of the opportunity from an educator at McNair who happened to be Tay's uncle.
349. Thomas introduced Tay to the program and immediately gave him instructions on what he needed to do to be hired and emailed him a plethora of times on updates about the program.
350. Tay signed multiple American Dream Contracts with ADC and the State to be a private-contract tutor in Brevard County, including but not limited to the ADC personnel form, W9 Tax Payer ID number, criminal background check, Code of Ethics and Job Description contract that entailed Tay's social security number, birthday, educational background, driver's license number and bank account number for direct deposit.
351. Tay was enticed by ADC with the recruitment of black male professionals, educating students in Brevard, private contracted employment and the amount of pay. If Tay did not create positive learning environments for the students he had to tutor, commit his time to tutoring students at public and private locations with parent or guardian within the vicinity,

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<sup>111</sup> See <http://adctutoring.com/about-2/>; a Florida-based tutoring company providing quality tutoring services to Title I schools through the Supplemental Educational Services (SES) program.



feed the students snacks, and submit his hours per week for specific pay periods he would not get paid.

352. Tay used email and fax to communicate with ADC including but not limited to sending invoices to ADC to describe the date of service, description of the service, the hours worked, the pay per hour and the total pay for the invoice date, which were signed by Tay and Thomas Owens.
353. The students and parents were lured to sign up at various School Board schools by ADC and other tutoring companies with candy, pencils, hats, snacks and other appropriate sign up incentives using Tay's Exclusive Image and Likeness, Name and Likeness and Property.
354. Tay was privately contracted through ADC, and was the lead tutor in Central Brevard and in charge of about 12 kids and 2 other tutors in the Central Brevard area, who were both black and African American School Board employees and or retired School Board employees.
355. There were discrepancies that were unlawful within the order in which this company operated from the get-go, but Tay the needed the money and continued to tutor because he loved meeting with the kids and educating them. Tay built a remarkable relationship with the parents and the students he were tutoring, and had great improvement from the students he tutored through in-school grade performance. The results of the students progressing is what made Tay not want to stop tutoring.
356. Tay brought the students snacks out of pocket with his food stamps from Wal Mart, free snacks and illegal gambling from Allied Veterans, and was not reimbursed for his purchases with receipts of purchase sent to ADC via fax and personally to Thomas Owens.



357. ADC breached their duty of care and contract liabilities of paying Tay, and the dates of paying Tay in conspiracy with the State and Obama to tutor kids from communities of Tay's likeness with the more students enrolled in ADC, the more money ADC and the State receives per child from the United States.
358. Tay was not impressed with the order of operations of ADC and decided to part ways with the company on October 30, 2009 through email with Thomas Owens and other ADC representatives.
359. On January 25, 2010, ADC initially gave Tay a Federal Income Tax form with a significant amount of money that he did not received. Tay contacted ADC and told them to either fix the problem, or he'll take them to court for breach of contract and fraud.
360. Tay did a superb job as a tutor, but wasn't treated right when it came to being paid which therefore breached the contract of implied covenant good faith, and their fiduciary duty of trust.
361. When the School Board found out Tay was a private tutor for ADC, they developed a procedure that all ADC private tutors have School Board badges and take a drug test so that he could not earn money, practice his religion, invade his privacy again and steal Tay's money to convert his funds for public and or private use as a contracted tutor.
362. Five months later around February 16, 2010 after Tay resigned from the company, ADC told Tay that he needed to take a drug test and purchase a Brevard County educator badge.

#### *5. Florida's Illegal Gambling Scheme*

363. Allied Veterans made campaign contributions to numerous State and local public officials, including but not limited to about \$2000 to Rick Scott's 2010 Governor campaign, as former Lt. Governor Jennifer Carroll did consulting work for Allied Veterans in 2009 and





2010 receiving a unknown monetary fee amount, about \$500 - \$1000 to FL Congresswoman Corrine Brown, about \$271, 000 to the Republican Party of Florida, and other contributions to other unknown State public officials.

364. To use the machines, Tay has a swipe card. Tay can then charge monies to such card at a centralized terminal location on the premises or at the counter with one of Allied's employees. Thereafter, Tay must swipe his card on a computer terminal that is used to operate a touch screen computerized slot machine.

365. Upon obtaining any forms of winning combinations, Tay are automatically credited those monies or additional play chances to the swipe card that can be cashed in at any time by Tay. Alternatively, Tay may receive additional "credits" to be used in the alleged game promotion or sweepstakes.

366. The machines used in these establishments are slot machines, as defined by Florida Statutes, and are almost exclusively used as such. Similar to a Las Vegas style slot machine, the "wheels" on the screens "spin." Tay is able to stop the "wheels" in the hope of increasing their chances of obtaining a winning combination by lining up the cherries, bars, or a combination of any other winning symbol depending on the game being played. Upon winning, patrons are awarded credits that can be cashed in for money at any time.

367. Allied has a snack section in their establishments including potato chips, crackers, peanuts, soft drinks and sodas for free without exchanging any money for internet time. Around the month of April 2012, Tay was then denied chips and soda because he didn't give the Allied employee money to add to his card.

368. In an effort to mislead the public into believing that they are not profiting from an illegal gambling enterprise, Allied Veterans and others have engaged in a conspiracy and scheme to



defraud. Based on investigation conducted to date, this conspiracy and scheme to defraud has consisted of, among other things, the following types of representations: a) Falsely representing that the Internet Casinos that used the Allied Veterans name were "fundraising centers" for Allied Veterans to raise money to directly benefit its charitable causes, when, in truth and in fact, the primary purpose of the Internet Casinos was to make profits for Allied Management, IIT, the for-profit companies that operated the Internet Casinos, and the individuals who owned those businesses (as is further described in paragraphs in above paragraphs); b.) Falsely representing that a Section 501(c)(19) Veterans Organization owned and operated the Internet Casinos until they were allegedly "sold" in April 2012; c.) Falsely represent that Allied Veterans was a member of the Veterans Administration (; d. Falsely representing that the money spent, and lost, at the Internet Casinos that used the Allied Veterans name went directly to a Section 501 (c)( 19) Veterans Organization that would donate the net proceeds to charity;

369. In 2011, a School Board meeting agenda says Allied Veteran's managers donated \$7,000 – on behalf of Allied Veterans – after computers were stolen from Palm Bay Elementary.

370. To further this conspiracy and scheme to defraud, Allied Veterans and others used, or caused to be used, interstate wires in the form of wire transfers of proceeds and communications between and among the IIT server in Oklahoma and the Internet Casinos in Florida, among other things. Allied Veterans and other also used, or caused to be used; the United States mail to send communications that furthered the scheme to defraud.

371. The result of this conspiracy and scheme to defraud is that Allied Veterans and others have enriched themselves. As noted above, more than \$250 million of the proceeds received from the Internet Casinos were paid to IIT and the for-profit companies that operated the



Internet Casinos, as opposed to being provided to Allied Veterans to donate to charity. As a result, the amount of donations made by Allied Veterans is only about 2% of the total that has been earned. Allied Veterans and others have used the proceeds of their operation to launder millions of dollars.

372. The operation of these illegal gaming establishments violates the moral and ethical standards of the community. As such, Defendants are engaged in activity that is illegal and damaging to the community as a whole.

373. "Operation Reveal the Deal"<sup>112</sup> uncovered a sophisticated racketeering and money laundering scheme stemming from 49 illegal gambling centers operating under the guise of Internet cafes or strip mall casinos. Investigators claim it ran gambling centers and illegal slot machines, funneling the illegal proceeds through a sophisticated web of for-profit corporations that paid off the Allied Veterans of the World management, software provider IIT and lawyer Kelley Mathis.

374. Allied Veterans claims its mission is to serve veterans in need; Allied by and through their operation of the specified gaming establishments, are engaged in illegal gambling, as defined by Florida law.

375. The Tay Tay Terror Attack returned and or placed Tay in poverty and or peonage by knowingly making him a victim in a illegal gambling and lottery scheme; not awarding him employment as a cashier that he detrimentally relied on; and closing Allied's so that Tay could not receive 100 free entries, free beverages and snacks, and a BIG WIN with the purchase of those 100 free entries or more entries to pursue his Self Made American Dream.

376. Therefore devising the *Florida Lotto Scheme* pursuant to the March 5, 2009 Document on, before and after February 9, 2009:

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<sup>112</sup> <http://www.wftv.com/news/news/local/allied-veterans-locations-raided-after-top-leaders/nWqq8/>



377. Tay was lured by the State's marketing and advertising of the Power Ball and other State lottery gaming between single, double and triple digit million dollar winnings. Tay played scratch off's, Lotto, Cash 3, Fantasy 5 and Power Ball in attempt to escape poverty to obtain and acquire his Self Made American Dream.
378. Proceeds from every dollar spent on Florida Lottery tickets allegedly help provide educational funding for the State's school children. Whether its Bright Futures scholarships, better books, technology for schools, or bonds for school construction, the proceeds from State Lottery ticket sales are transferred to the Educational Enhancement Trust Fund (EETF) and appropriated by the State Legislature.
379. As the Florida Lottery has grown into an industry leader, it remains an alleged dependable contributor to education in the State. More than a \$1 billion in each of the past ten fiscal years has benefited State students and schools statewide, representing approximately six percent of the State's total education budget. Thousands of bright minds such as Tay have followed the beacon offered by Florida's Bright Futures Scholarship Program and other student financial aid to pursue opportunities in higher education at State universities and community colleges, such as FAMU. These institutions of higher learning themselves have benefited from more than \$6.3 billion that help keep them running and affordable to State students.
380. The State Lottery has become part of the very fabric of the State, truly affecting the lives of all Floridians and providing residents with a reason to believe their dreams can come true pursuant to the *Florida Public Education Lottery Act* (Chapter 87-65, Laws of Florida), which implemented the constitutional amendment. Section 24.102(2), Florida Statutes (F.S.), represents the expression of intent by the Florida Legislature for the lottery.



6. *Food Stamp Scheme*

381. Tay is a recipient of U.S. government food stamps and was forced to look for employment through employment programs required by the Department of Children and Families [“State”], and have been since around November 4, 2008.
382. Individuals who work for low wages, are unemployed, such as Tay, or work part-time, receive public assistance, are elderly or disabled and have a small income, or are homeless may be eligible for food stamps. Furthermore, food stamps can only be used for food items and for plants and seeds used to grow food. Food stamps cannot be used to purchase nonfood items such as deodorant, toothpaste, shoes, and clothes.
383. The goal of the Food Stamp Defendants and or RICO Defendants and or SNAP (food stamp) program is “to alleviate hunger and malnutrition ... by increasing food purchasing power for all eligible households who apply for participation” as stated in the Food Stamp Act of 1977, as amended (P.L. 108-269).
384. It provides food stamps for needy individuals that can be exchanged like money at authorized stores. The federal government pays for the amount of the benefit received, while State pays the costs of determining eligibility and distributing the stamps. In addition, state public assistance agencies run the program. Chase hold contracts with federal, state, and municipal agencies to provide EBT cards and services, collect interest on federal reserve money held for government programs (though not on SNAP funds), charge transaction fees for merchant use of food stamp technology and infrastructure, and levy penalties on users for EBT card loss, out-of-network use, and balance inquiries. Chase make money distributing government benefits if the economy is bad, because more people sign up for assistance; they



make money if the economy is good, because rising interest rates mean more profit on the money they hold to distribute to beneficiaries. ["Food Stamp Scheme"]

385. Christopher Paton is a Managing Director at Chase who colluded with other Chase employees, the USDA, Jennifer Johnson and the Federal Reserve, Xerox, Citigroup and the State *inter alia*, to seek and or receive data info about Tay, and benefit from the trafficking of Tay through the food stamp slave trade scheme.

386. It provides food stamps for needy individuals [Tay] that can be exchanged like money at authorized stores. The USDA pays for the amount of the benefit received, while State pays the costs of determining eligibility and distributing the stamps. In addition, State public assistance agencies run the program [FDCF].

387. Since 2007, Florida has been contracted to pay JP Morgan \$90,351,202.22 or more for the Food Stamp Scheme<sup>113</sup>.

388. The US Department of Labor disburses Employment and Training Administration Funds to the State, and or Brevard and or Cocoa in job training programs to improve the employment prospectus of Tay and other adults, youth and or dislocated workers. Tay had attended a mandatory food stamp and or job training class in Cocoa with the Brevard Workforce where he was assessed about \$25 as Cash Assistance on his food stamp card for attending. Tay went on numerous job searches and could not retrieve employment, and were forced to find employment with a failure to participate notice for the on the job search inquiry which would make Tay ineligible for the food stamp and 'Back to Work Budget'.

389. The Food Stamp RICO Defendants, being a public officer within the jurisdiction of the USDOA and USDOL attempted or conspired to knowingly falsified, concealed, or covered up the [ Tay Tay Terror Attack] by the material fact that Tay would be receiving \$200 for 6

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<sup>113</sup> See <http://www.commondreams.org/views/2013/10/20/food-stamp-corporate-welfare>.



months knowing he would be receiving \$189 per month, and made that material fact materially false, fictitious, with a fraudulent representation that Tay would be receiving \$200 for 6 months, or makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or representation the authorization, transportation, transmission, transfer, disbursement, or payment of the food stamp benefit is in or affects interstate or foreign commerce; the food stamp benefit is transported through wires, devices, benefit cards, and food stamp transactions from the Food Stamp RICO Enterprise at any point in the authorization, transportation, transmission, transfer, disbursement, or payment of that benefit; and the food stamp benefit is a record, voucher, payment, money, or thing of value of the United States, or of any department or agency thereof. Food Stamp Scheme are in violation of 18 USC § 1001, §1002, §1018 and §1035.

390. Tay receives \$189 per month in food stamps and the FDCAF have yet to notify Tay of the food stamp changes in that he would be receiving \$189 per month rather than \$200.

391. The Defendants and or RICO Defendants have not helped Tay find employment and or get off food stamps and have benefitted substantially financially, as a brand, individually and cohesively the this Food Stamp Scheme against Tay to place and or return him to poverty.

392. The named and unnamed Defendants have denied Tay employment because of the Tay Tay Terror Attack; because he is an Exclusive Name and Likeness (public figure); a black male under the age of 30, from Cocoa with an education from FAMU that receives food stamps living below the poverty line.

393. Wherefore the Defendants and or RICO Defendants are in violation of 18 USC § 1040 (Fraud in connection with Emergency Benefits) to defraud Tay his intangible rights for honest service.









*7. Marijuana Discrimination Scheme*

394. The Defendants and or RICO Defendants target black people such as Tay's Image and Likeness with the oppression of marijuana while appropriating funds to target and Tay's Image and Likeness for marijuana or marijuana paraphernalia, or any other drugs being in and from a low income black community (as defined in 20 USC § 1087ii(a)).

395. After public knowledge of the March 5, 2009 Document Tay has been viewed to the public as a Dope Boy with Trade Secrets from Cocoa potentially laundering money <sup>114</sup> pursuant to 18 USC §1956(a)(1) from trade secrets through his corporations and or fictitious business, financial institutions and non-bank financial institutions as defined in and pursuant to 31 USC § 5312.

396. The United States have consistently denied that marijuana has any medical benefits<sup>115</sup>. On the other hand, the United States actually holds patents for the medical use of marijuana. US Patent 6630507 titled "Cannabinoids as antioxidants and neuroprotectants" which is assigned to the United States, as represented by the Department of Health and Human Services. The patent was obtained in October of 2003.

397. The primary goal for the Defendants and or RICO Defendants through the Tay Tay Terror Attack were to keep arrest numbers up and exclusively in black neighborhoods to obtain and acquire funding to enforce the United States and the State's drug program.

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<sup>114</sup> Money laundering activity may violate 18 USC §1956, 18 USC §1957, 18 USC §1960, and provisions of Title 31, and 26 USC §6050I of the United States Code (USC).

<sup>115</sup> The patent claims that - "Cannabinoids have been found to have antioxidant properties, unrelated to NMDA receptor antagonism. This new found property makes cannabinoids useful in the treatment and prophylaxis of wide variety of oxidation associated diseases, such as ischemic, age-related, inflammatory and autoimmune diseases. The cannabinoids are found to have particular application as neuroprotectants, for example in limiting neurological damage following ischemic insults, such as stroke and trauma, or in the treatment of neurodegenerative diseases, such as Alzheimer's disease, Parkinson's disease and HIV dementia."



398. The State intentionally did not pass HJR 353/SJR 1028 – Florida Medical Marijuana Law intentionally to deprive Tay and other State citizens with his marijuana medicinal likeness their 1<sup>st</sup> Amendment Right to ‘freedom’ of religion and adequate healthcare, to pursue Tay as a well organized yet dangerous “*Florida – International*” (“Tay Tay Taliban”) Dope Boy for conviction of multiple marijuana charges and intentionally harm his life with traumatic law enforcement experiences<sup>116</sup>; rather than observe him as a safe, respectful and responsible Florida Christian – Rastafarian, black male ganja consumer to continue the *Tay Tay Terror Attack* on his life and deeply root him in poverty based upon this likeness.

399. Defendants and or RICO Defendants agreed and intentionally created a Dope Boy scheme or the Tay Tay Terror Attack to create *Weed Wars*<sup>117</sup> between individuals and or citizens and or immigrants in low income communities as a means of survival to potentially get arrested by law enforcement to receive additional allocated funds from the United States and the State to target Tay so that Defendants can profit from the Tay Tay Terror Attack against Tay<sup>118</sup>.

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<sup>116</sup> Probable cause to stop Tay for arrest; to handcuff, book, fingerprint, have him sit in a general population cell with real criminals (rapist, murderers, domestic violence, theft, assault, drug dealers), arraign him and convict him of misdemeanor and or felony criminal charges.

<sup>117</sup> “Weed Wars”; competition or battle between individuals and or groups and or organizations of medicinal marijuana Dope Boys, and or Dope Boys, to obtain, retain and maintain marijuana customers, jurisdictions and territories within low income - poor communities and middle class, and the upper “elite” class communities which therefore leads to but not limited to mergers, turf wars, murders, thefts, robberies and other life threatening damages. Marijuana is an earth - natural commodity that can guarantee return and or profit through possession, consuming, and distribution that can be obtained through the Underground Dope Boy drug trade for reasonable cost per different grades of potency, freshness of marijuana by and through the illegal import – export trade between U.S. and Foreign Countries.

<sup>118</sup> See <http://www.dailyfinance.com/2010/04/20/pot-economics-who-stands-to-profit-if-marijuana-is-legalized/>; recognize as if marijuana is legal and mentioned companies and or Defendants have profited and benefited from marijuana users such as Tay and those similar marijuana consumers.



400. Tay consumes marijuana<sup>119</sup> as a Christian – Rastafari religious practice to relieve stress and cope with being denied opportunity and the deprivation of his life through the referenced herein, Tay Tay Terror Attack. The Tay Tay Terror Attack put Tay’s Exclusive Name and Likeness and Property, and Tay’s livelihood in danger by forcing Tay to go to ‘dangerous places’ to purchase marijuana from ex-con’s and or convicted felons and or United States, and or the State and or United Nations citizens for his religious and medicinal use including but not limited to places referred to as “the Trap House”, the “Dope House”, the “Crack house”, the “Frat house” when he is a GOD – fearing professional with an Exclusive Name and Likeness and college degree so they could arrest him within a Dope Boy scheme [Tay Tay Terror Attack] and that at least (1) arrest could ruin Tay’s Exclusive Image and Likeness and Tay’s livelihood.

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<sup>119</sup> Thus consuming ganja is necessary for the practice of his religion itself. See *LaFave Scott*, 1 Substantive Criminal Law § 5.4, at 627 (1986); *Jenks v. State of Florida*, 582 So. 2d 676 (Fla. 1st DCA 1991), *See also Sowell v. State of Florida*, 738 So. 2d 333 (Fla. 1st DCA 1998). Tay is faced with a choice of certain blindness or using marijuana to save his sight, a reasonable person would use marijuana. Florida Appellate courts have expressly recognized the medical marijuana necessity defense. The Supreme Court decision is limited to the Federal Statute, and is not binding in Florida courts interpreting the medicinal medical necessity defense under Florida law. In *Jenks v. State of Florida*, 582 So. 2d 676 (Fla. 1<sup>st</sup> DCA 1991), the court held that the couple established sufficient evidence to establish the medical necessity defense at trial as a matter of law. The Court ordered the medical necessity defense as follows: 1) The defendants had no control over the circumstances which required the choice between the lesser of two evils.; 2) No less harmful alternative was available; and 3) The harm sought to be avoided was less offensive than the criminal acts committed to avoid it. The *Jenks* Court specifically reasoned that “the fact that marijuana was classified as a Schedule 1 controlled substance did not preclude the medical necessity substances are currently accepted for certain limited medical uses in treatment in the United States but have high potential for abuse.” “However, the 1<sup>st</sup> District Court of Appeals again held that the medical necessity defense applied to marijuana cultivation cases when sufficient evidence support the defense.” *See Sowell v. State*, 738 So. 2d 333(1998). The “limited medical uses” language which was formerly contained in section Fl. Stat. 893.03(1)(d) did not directly address the medical use of marijuana or the defense of medical necessity, and under established rules regarding the preservation of the common law the chapter 93-92 amendment to section Fl. Stat. 893.03(1)(d) does not affect the defense of medical necessity. Indeed, the existence of this provision was not critical to the decision in *Jenks*, which was more fundamentally predicated on the understanding that the “no currently accepted medical use” language in the subsection (1) introduction relates to general medical availability, and does not preclude the common law defense. As in *Jenks*, the appellant should have been allowed to pursue the defense of medical necessity. *See also Sowell v. State of Florida*, 738 So. 2d 333 (Fla. 1st DCA 1998)



401. After the transmittal of fraudulent representations of a Florida Chain of Custody pursuant to the March 5, 2009 Document or Tay Tay Terror Attack through USPS Certified Mail and published false pretenses and fraudulent representations on the internet pertaining to Tay and the March 5, 2009 Document, Tay allegedly has been viewed to the public as a exclusive Dope Boy with Trade Secrets from Cocoa potentially laundering money <sup>120</sup> pursuant to 18 USC §1956(a)(1) from trade secrets through transactions in his corporations and or fictitious business, financial institutions and non-bank financial institutions as defined in and pursuant to 31 USC § 5312.

402. Tay Tay Terror Attack target black males, and or black people and or black men and people in low income communities such as Tay's Image and Likeness with the oppression of marijuana while appropriating funds to target and Tay's Image and Likeness for marijuana or marijuana paraphernalia, or any other drugs being in and from a low income black community (as defined in 20 USC § 1087ii(a)).

403. The United States have consistently denied that marijuana has any medical benefits<sup>121</sup>. On the other hand, the United States actually holds patents for the medical use of marijuana. US Patent 6630507 titled "Cannabinoids as antioxidants and neuroprotectants" which is assigned to the United States, as represented by the Department of Health and Human Services. The patent was obtained in October of 2003.

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<sup>120</sup> Money laundering activity may violate 18 USC §1956, 18 USC §1957, 18 USC §1960, and provisions of Title 31, and 26 USC §6050I of the United States Code (USC).

<sup>121</sup> The patent claims that - "Cannabinoids have been found to have antioxidant properties, unrelated to NMDA receptor antagonism. This new found property makes cannabinoids useful in the treatment and prophylaxis of wide variety of oxidation associated diseases, such as ischemic, age-related, inflammatory and autoimmune diseases. The cannabinoids are found to have particular application as neuroprotectants, for example in limiting neurological damage following ischemic insults, such as stroke and trauma, or in the treatment of neurodegenerative diseases, such as Alzheimer's disease, Parkinson's disease and HIV dementia."



404. The primary goal for the Defendants and or RICO Defendants and the State through the Tay Tay Terror Attack were to keep arrest numbers up and exclusively in black neighborhoods to obtain and acquire funding to enforce the United States and the State's drug program against those who consume marijuana.
405. Congressman Barney Frank (D-MA) and Sen. Ron Paul (R-TX) [United States] are co-sponsors of the Ending Federal Marijuana Prohibition Act of 2011, which would remove marijuana from the list of federally controlled substances in order to permit states to decide how to regulate it. It would remove all federal criminal penalties for the use of marijuana and possession of amounts for personal use in states where medical marijuana is permitted, and would thus reduce the number of prosecutions that occurred under the Bush administration and continue under the Obama administration.
406. In current United States and State marijuana policy and legislation encourages discrimination because it overwhelmingly captures minority youth or young adults of Tay's Image and Likeness and or Name and Likeness and Property and or Tay's [L]ikeness. Possessing small amounts of marijuana is not a crime unless it is displayed in public. So as part of the Governments police department's stop-and-frisk program, officers ask suspects to empty their pockets<sup>122</sup> and they then arrest them if they happen to be carrying marijuana, because by removing it from their pockets, they display it in public<sup>123</sup>.
407. Tay was racially profiled and harassed by Cocoa law enforcement before February 9, 2009 assuming he had marijuana because he was walking in his neighborhood around 9 p.m. in an all-black Jordan jumpsuit and some lime green Nike Air Stab sneakers. Tay was illegally searched without any probable cause, then later went to the Cocoa City Hall to fill

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<sup>122</sup> Cocoa and Brevard Stop and Frisk on Tay before February 9, 2009 and after December 25, 2008.

<sup>123</sup> See [http://www.law.harvard.edu/news/2011/10/21\\_barney-frank-at-hls-on-current-marijuana-policy.html](http://www.law.harvard.edu/news/2011/10/21_barney-frank-at-hls-on-current-marijuana-policy.html).



out a complaint, but was told he had to go to the police department to do so. He signed in on a date unknown in January and did not go to the police department because he feared retaliation for his life as a black male from Cocoa in the Diamond Square Community.

408. Tay alleges that the words “**YOU ARE UNDER ARREST**” frightens him extremely and makes him allergic to any forms of citizen detainment, especially handcuffs.

409. Tay alleges that if he knew he was being schemed upon and the results of a piss poor education operation was apparent before February 9, 2009, he would have said, “fuck school, I’ll be ugh dope boy.” From damages, Tay can’t even become a profitable drug dealer even if he wanted to because it takes money to make money. Tay has none and or has no monetary resources to become a profitable drug dealer.

410. Defendants and or RICO Defendants Law enforcement officers in the State (i.e. Alachua County) arrest more than six times as many black defendants as white defendants on marijuana charges, although research shows use of the drug is about as common among blacks as whites.<sup>124</sup>

411. On, before and after the March 5, 2009 Document by and through the Tay Tay Terror Attack and exclusively the School Board and the State RICO Enterprise schemed to defame, humiliate and maliciously torture Tay’s Exclusive Image and Likeness, Name and Likeness and Property with a fraudulent official writing of a fraudulent drug test<sup>125</sup> and Florida Chain of Custody procedure. The Tay Tay Terror Attack were to intentionally deny, discriminate,

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<sup>124</sup> See <http://www.gainesville.com/article/20130608/ARTICLES/130609666>.

<sup>125</sup> Drug testing does not protect public safety. It serves mainly to identify and ban cannabis consumers from the workforce, or sanction them at the workplace or schools. Drug Testing primarily targets people who use marijuana, as the other drugs which are tested dissipate very quickly. Marijuana may remain detectable for up to 90 days -- long after the effects are felt. Often people who have never done any drugs will fail a drug test as a result of false positives and inaccuracies within the testing industry itself. See [http://cannabisconsumers.org/reports/drug\\_testing.php](http://cannabisconsumers.org/reports/drug_testing.php)



traffic and terrorize Tay's employment procedure as a substitute teacher with the School Board and the State based on a falsified drug test because of his Exclusive Image and Likeness, Name and Likeness and Property including property from his Heavenly Father to torture him mentally, physically and financially with the ramifications of the fraudulent drug testing being loss of jobs and or Exclusive Name and Likeness reputation, loss of benefits and pensions, or loss of custody of children, denial of transplants, and revocation of probation or parole; landing more people in jail (thus, increasing the United States and the State's private or public prison industrial system) and other damages as mentioned in Damages herein.

*8. Delayed Justice Scheme*

412. From the income Tay received from tutoring with ADC Tutoring Inc., selling his food stamps and or allegedly selling and or distributing marijuana, Tay paid over \$400 to file a civil complaint and about \$120 worth of summons delivered by Brevard Sheriff's Department, and filed suit in 18<sup>th</sup> Judicial Circuit for employer discrimination on November 13, 2009 against *the School Board*.
413. Tay pursued justice in the 18<sup>th</sup> Judicial Circuit for Brevard court on or around November 13, 2009 as *Pro Se* alleging employment discrimination against the School Board of Brevard County as the case<sup>126</sup> ("the Sham 2009 Litigation"<sup>127</sup>) was removed to the Federal jurisdiction due to civil rights questions. Tay demanded \$365 million in damages.

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<sup>126</sup> Case No. 6:09-cv-02033-GAP-KRS

<sup>127</sup> School Board had affirmed that Michael Bowling ["Bowling"] represents them as their attorney in the Smith 2009 Litigation<sup>127</sup> [hereinafter referred to as "Sham 2009 Litigation", and or "Smith 2009 Sham Litigation", and or "Smith Litigation"]; which means the Case No. 6:09-cv-2033-Orl-31KRS and is authorized to pursue and defend their interest in the Middle District of Florida Court. School Board signed documents appointing him as their "Common Attorney" which required him to "undertake all appropriate legal action to defend the[ir] rights and authorized him to appear on their behalf in connection in the Smith 2009 Litigation and if necessary to delegate his powers of attorney's, School Board ratified





414. As Tay's personal Compaq Presario computer were having technical difficulties, the United States forced Tay to work on his personal computer(s) in the Brevard – Cocoa library through the Brevard Library System for a duration of about 360 minutes a day to compile and author personal, entrepreneurial, and litigation papers for duration of time, having to walk to and from the Brevard – Cocoa library from his abusive home causing him severe mental and physical damages and distress to trace his Trade Secrets and [L]ikeness through his library card number and last name.

415. Tay was forced to use the Brevard public library computer and internet service (Microsoft software licensee services) for the Sham 2009 Litigation against the School Board. Tay is a member of the Brevard public library (Central Brevard Library) in Cocoa and has a library card with an identification number and bar code to identify Tay when checking out books, and or using the internet and or making copies and or printing;

- a. As a member of the Central Brevard Library in Cocoa, Tay is forced to agree with the Computer and Internet Use Policy<sup>128</sup> and Brevard Library System for computer use. When using any programs at the Central Brevard Library such as Microsoft Word, Brevard is the author of Tay's work.
- b. United States and Brevard [State] tracks Tay's Exclusive Name and Likeness and Property by Tay using his library card and or number when logging in onto a computer and any other service that's provided, and or unsafe USB ejects, and other transactions through wires and devices pursuant to 20 USC §§ 352-354.

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and approved each and every action to date performed by the School Board or by any others authorized by the School Board to act in the defense of the [School Board] Defendants' interest in the Smith 2009 Litigation and in all other related actions. Bowling affirmed that as legal counsel "I have the authority to make and sign contracts, hire and retain legal consultants, and designate to others all or part of my power to represent the [School Board] Defendants."

<sup>128</sup> See <http://www.brevardcounty.us/PublicLibraries/Computers/computer-use-policy>.



416. On January 26, 2010 a Case Management Schedule was ordered and confirmed by Middle District – Orlando Division Hon. Judge Gregory Presnell, and agreed upon by Tay, the School Board and Michael Bowling which had set a jury trial date on April 4, 2011 at 9:00 a.m. in Orlando Courtroom 5A. [“DATES RIGHTS”]
417. On February 2, 2010 Michael Bowling on behalf of the School Board and Leroy Berry offered Tay a \$50 offer of judgment for all costs and damages after Tay sent them answers to interrogatories including the damages he suffers in the Middle District of Florida – Orlando Division. This act was done in retaliation of Tay running for Mayor of Cocoa, being a Exclusive Name and Likeness, and filing a discrimination lawsuit against them, and therefore was tampering by intimidation and threats of Poverty Prison with Tay as a witness to the Tay Tay Terror Attack in violation of 18 USC § 1512 to delay adequate relief, with the intent to impair Tay and his Equal Employment Opportunity integrity or availability for use in an official proceeding.
418. On February 11, 2010, Tay notified the Middle District of Florida – Orlando Division of his rejection of the “insulting offer” of \$50 from Leroy Berry or the School Board. (See Sham 2009 Litigation, Doc. 37)
419. On March 1, 2010 Judge Presnell stated in his order at Footnote 2 (Doc. 46, 2009 Case) that the “*School Board engaged in a nefarious scheme to deny [Tay] employment as a substitute teacher based on a falsified drug test*”, which also allowed him to amend his complaint.
420. On about March 5, 2010 [“Tay Tay Terror Attack”] Tay received a copy of the School Board’s AIG \$2 million insurance coverage agreement for claims of negligence amongst other things from the School Board including but not limited to Michael Bowling, Esq.,



Harold T. Bistline, Esq. (School Board Attorney), David Wilson, Claims Adjuster, Tracey Pell, Claims Adjuster, Mark Langdorf and Risk Management Director for the School Board. The School Board and State Defendants and or RICO Defendants and AIG knew or should've known that Tay was denied employment based upon an employment hoax by the School Board and State Defendants and or RICO Defendants pursuant to School Board and AIG's agreement in the AIG Domestic Claims General Litigation Management Guidelines and AIG's litigation Management Program<sup>129</sup>. This was an act of intentional infliction of emotional distress and intentional discrimination in damages of employment of Tay's Exclusive Name and Likeness and Property. This intentional negligence, and or fraud and terrorist torture acts were foreseeable and could have been prevented by the School Board and the State, and AIG.

421. On March 18, 2010 Michael Bowling and the School Board incorporated in a Motion to Dismiss Tay's 3<sup>rd</sup> Amended Complaint and supporting memorandum, attached Tay's alleged partial and or initial drug test results from School Board and State Defendants and or RICO Defendants which inflicted Tay's suffering emotional distress in violation of Fed. Rule Civ. P. 5.2 – Privacy Protection, and Fl. Stat. 1012.31 (3)(a)(1) by submitting to the court an attachment of a drug test result from Dr. Neil J. Dash with Tay's social security number available for public view by not blocking and or protecting his Data Info ("Defendants meeting of the minds"). The School Board's Certificate of Service was through the USPS mail or filed electronically to the Middle District – Orlando Division and or the other Defendants. The School Board stated on page 13 of 17 that:

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<sup>129</sup>Generally pursuant to the entire policy and wherefore exclusively within the litigation Management Program Section III – The Agreed – To Litigation Plan: Case Management, Resolution Strategy, Case Management, Budget; Section IV – Communications; Section V – Case Management; G. Settlement Activity [hereinafter, "3-5-365 Terror Attack" and or "Tay Tay Terror Attack"].



“In any event, and to put an end to the Plaintiff’s complaint thereon, a copy of results is attached hereto as Exhibit “A”.”

422. The Defendants and or RICO Defendants knew Tay was treated unfairly in his efforts to receive an Equal Employment Opportunity as a substitute teacher with the School Board and State Defendants and or RICO Defendants based on a falsified drug test before and on March 5, 2009 from the March 5, 2009 Document.

423. On March 24, 2010 (1 day before Tay’s birthday) Tay responded with extreme emotional distress and stating that the School Board refused to hire him because he is a Never Ignorant Getting Goals Accomplished (NIGGA) with an intentional falsified drug test.

424. On April 1, 2010<sup>130</sup> [Hereinafter, “the April Fool’s Order”] Judge Presnell ordered and published the order that defamed Tay’s Exclusive Name and Likeness and Property indefinitely. Stating that because of Tay’s response with his “cultural syntax... he is unqualified to teach in Florida’s public schools,” and that his case was “utter nonsense.” Ordering each party to pay their own fees and costs because Tay stated the School Board and State Defendants and or RICO Defendants did not hire him because he is a “NIGGA” from Cocoa<sup>131</sup>.

425. On April 13, 2010 Tay motioned to reopen the case with a Motion for leave to file an amended complaint.

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<sup>130</sup> Is the same date that Space Coast Business Marketing published “100 Most Powerful People On the Space Coast” including but not limited to named and unnamed Defendants. See <http://www.spacecoastbusiness.com/100-most-powerful-people-on-the-space-coast/>

<sup>131</sup> See Witness for Justice; Across the map; Jones, Diane Ford. Westside Gazette. Ft. Lauderdale, Fla.: Nov 24 – Nov 30, 2005. Vol. 34, Iss. 36; pg. 6. This article gave information to describe what we as human beings demand which include mutual respect, dignity, and their inherent right to transcend their subsistence in parceled varieties of misery as then try to survive. Posing that they (white people) know something the rest of us will come to learn.



426. On April 26, 2010 Judge Presnell issued an Order denying Tay's Motion to reopen case and his renewed motion for leave to file a 4<sup>th</sup> Amended complaint, and prohibited Tay from filing any further pleadings in the 2009 Case.
427. On May 11, 2010 Tay filed a Notice of Appeal on his motion to reopen the case with a motion for leave to appeal in forma pauperis.
428. On May 20, 2010 Judge Presnell issued an order confirming and adopting Magistrate Spaulding's May 12, 2010 Report and Recommendation and denying Tay's motions for leave to appeal in forma pauperis. Tay was denied his motion to precede in forma pauperis and his writ of appeal in the 11<sup>th</sup> Circuit Court of Appeals and the U.S. Supreme Court because he did not and could not pay a fee.
429. This case became a sham litigation ["Sham 2009 Litigation"] based upon the fraudulent judgment and material factual misrepresentations by the USDOJ, the School Board and State Defendants and or RICO Defendants which led to multiple other civil court filings which also led to sham and fraudulent judgments based upon the Smith 2009 Sham Litigation thereafter the April Fool's Order. ["Smith 2009 Sham Litigation"]
430. Tay motioned to recuse Justices from preexisting and future prejudices of his case, as Gregory Presnell recused himself from the 2011 case in the Middle District of Florida – Orlando Division on the grounds that he officiated the *Nino Lyons Case*<sup>132</sup> which Tay has the likeness of.
431. On about December 21, 2011 in the Brevard County Court, Tay motioned for reopening his case in the Original jurisdiction. The Hon. Judge Robert T. Burger sanctioned Tay by

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<sup>132</sup> Case No. 6:01-cr-134-Orl-31DAB



barring his claim with *res judicata*<sup>133</sup>. Tay and the School Board was scheduled a hearing for Tay's Motion to Reinstate, *inter alia* in front of the Hon. Judge Robert T. Burger, his clerk, the bailiff from the Brevard County Sheriff's Department and from a conference call of Michael Bowling on behalf of the School Board. Tay enthusiastically cried "*Tears of Joy*" (Rick Ross feat. Cee Lo Green) thanking God for finally facing a Judge so that he can show the Court his body of overwhelming evidence. The bailiff politely offered Tay a tissue for his tears, Tay denied because this wasn't a show he was putting on; this was Real Life Emotion Tay was displaying for the injustice of his livelihood when Judge Burger said to him "there's nothing I can do, it's out of my hands due to the law of *res judicata*." Tay shook all of their hands and walked out. (Case: 05-2009-CA-067245, *Smith v. School Board*)<sup>134</sup>

432. Tay's Exclusive Name and Likeness in judicial proceedings were meaning and knowingly compromised by the Brevard County Clerk of Courts office on March 5, 2012 through United States Postal Service. Tay issued a summons through Brevard Clerk of Court to have served on various Defendants including Obama as they were sent to the wrong address with a name of Tay's Exclusive Name and Likeness, but not Tay. Tay later received his mail from USPS postman "Vinny" from Tay's neighbor's knowledge of Tay's Exclusive Name and Likeness.

433. On April 27, 2012 Tay filed a motion for Emergency Injunctive Relief in the Middle District – Orlando Division due to intentional harm done to him and the extreme and hostile living environment where he resides, including; a riverfront home in Cocoa, paid utilities for 3 years, paid home insurance by Brevard County, a Bentley Mulsanne from Bentley Orlando,

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<sup>133</sup> Which no jury trial and or final judgment was rendered in any case on any of the merit of being denied employment as a substitute teacher in Brevard County based on a falsified drug test. Tay had the right to sue.

<sup>134</sup> The law (Fla. Sta. 768.28(9)) should not protect a state entity from these violations if evidence proves that they are presumed to be violated.



used as a guinea pig for the safe uses of marijuana in Florida by LabCorp, a legal marijuana license and immunity from marijuana arrest with free purchase of marijuana from law enforcement agencies in Florida, 3 year courtside season tickets to the Orlando Magic, an apology letter from Defendants individually, access to the Middle District's CM/ECF system because of Tay's poverty, and about \$365k for compensatory damages. He was denied injunctive relief by Judge Honeywell on same day and continued to be intentionally inflicted with emotional distress from those defendants and his family.

434. On or around March 26, 2012 (1 day after Tay's birthday) in the 18<sup>th</sup> Judicial Circuit in and for Brevard County or the 18<sup>th</sup> Judicial Circuit Court [hereinafter, the "18<sup>th</sup> Judicial Circuit Court"] in case 05-2012-CA-024237 the State, Attorney Gen. Pamela Jo Bondi and Special Counsel James A. Peters on behalf of Mike Haridopolis, in his official capacity as President for the Florida Senate or the State intentionally inflicted distress on Tay and his livelihood in a Motion to Dismiss stated that Tay being denied employment based on a falsified drug test "is a shame." The State demanded the Court to Order Tay to pay attorney fees and other fees knowing that Tay was indigent and was living below the poverty line. The State knew that Tay was relying on them for the accountability to protect State residents and consumers from negligent and fraudulent activity. The State breached its duty of care in rather Tay had sufficient evidence to give him any relief.

435. On May 10, 2012 Tay had a hearing in the Brevard Circuit Civil Court against the School Board of Brevard and the City of Cocoa and Mayor Mike Blake. The time for the hearing was about 10 a.m. and Tay was in the courtroom about 9:30 a.m. During the judge's break he stated that if "the parties knew each other that they should get together and come to a solution." Tay saw Atty. Debra Babb on behalf of the City of Cocoa and Atty. Michael



Bowling on behalf of the School Board and approached them with hugs and evidence as the courtroom was empty. Cocoa and the School Board denied to compromise with Tay, and Tay approached his Plaintiff position with a random attorney sitting at Tay's table who did not represent Tay. As Judge Maxwell returned to the courtroom he asked the random attorney was he representing Tay as the random attorney said "No." Tay allowed Defendants, Cocoa and the School Board to give their argument as he then gave his argument. During Tay's argument, the Judge stopped Tay and told him that he should've went to law school as Tay's case was dismissed with prejudice<sup>135</sup> because he did not possess at the time of Certified Mail returned receipts sending Notice of Claim letter's to the appropriate agencies.

436. On May 22, 2012 Mag. Judge Karla Spaulding issued a Show Cause Order as to Tay. On May 30, 2012 Tay filed for Emergency Motion for transportation and housing due to being homeless and having no transportation to show cause. On same day, Mag. Spaulding denied Tay's motion.

437. On June 12, 2012 Tay had to beg his already vindictive mother<sup>136</sup> to use her car to attend the hearing. At the hearing, Tay clearly and succinctly showed cause of his motions and demanded relief with a brief history of the case with concrete, legitimate and relevant evidence which Mag. Spaulding denied to view. Mag. Judge Spaulding insulted Tay, his livelihood, his case and his evidence with harsh demeanor towards him every time he got up to speak. Tay even stated at the end of the show cause hearing that the nefarious scheme was to enslave him right back where he started from.

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<sup>135</sup> The Honorable Judge Maxwell stated that Tay "should attend law school to be a lawyer" and that he gave a hell of a closing argument against the School Board and Cocoa on May 10, 2012.

<sup>136</sup> Who is the main reason Tay was kicked out his grandmother's residence due to the nefariously vindictive, verbally abusive and deceptive conspiring between his mother and grandmother on May 15, 2012.





438. On June 13, 2012 Mag. Judge Karla Spaulding recommended that the case be dismissed with prejudice and enjoin Tay from filing any future lawsuits asserting a violation of his federal constitutional rights arising from the facts underlying the 2009 Case, the 2011 Case and the 2012 Case without leave of court.
439. On August 7, 2012 Judge Honeywell adopted Mag. Karla Spaulding's recommendation and dismissed the case as "frivolous and vexatious" and was enjoined from filing in the Middle District of Florida ANY further lawsuit asserting a violation of his federal constitutional rights arising from the facts underlying the 2009 Case, the 2011 Case and the 2012 Case regarding the events leading up to being denied employment as a substitute teacher in Brevard County Schools, without first obtaining leave of court, and was prohibited from filing a pleading accept a Notice of Appeal.
440. On or around August 22, 2012 to September 18, 2012 Tay issued a summons and complaint by and through Brevard County (Sheriff's Department) and their process servers. Brevard, the sheriff (Jack Parker), the civil clerk, and the process servers were grossly negligent, breached their fiduciary duty of care, fraudulently misrepresented and conspired with the Clerk of Court by sending Tay an unsigned Return of Service to jeopardize and delay his case from being properly served on a named defendant.
441. Tay filed a Complaint against Allied Veterans of the World and Affiliated, Brevard County Florida, City of Cocoa, Mike Haridopolis, JP Morgan Chase, LabCorp, McDonald's 365 Black, NASA, Nike Inc., Orlando Magic, Pepsi Co, Royal Caribbean Cruises, School Board of Brevard County, Space Coast Business Marketing, State of Florida, Time Warner, Trinity Broadcast Network, Wal Mart, and the Weyco Group. The complaint was assisted with Summons and Complaints to most Defendants for them to be served. This case was



removed to the Middle District – Orlando Division on September 10, 2012. Tay’s Summons and Complaint were not served on those particular defendants.

442. On September 17, 2012 and September 18, 2012 Brevard County entered the “Type Writ” on “Return of Service” included as a “Summons/Complaint/Attachments/Offer of Judgment/Attachments. Tay did not attach any offer of judgment with attachments to his Complaint and Summons served on Pepsi Co. and Allied Veterans of the World.

*1. Private Criminal Complaint*

443. On November 9, 2012 Tay filed a private criminal complaint in the Middle District – Orlando Division as the affiant in a civil rights litigation. Upon inquiry through Search Engines and the Middle District of Florida – Orlando Division intentionally inserted Tay as a co-defendant and co-conspirator to portray him as an exclusive Dope Boy from Cocoa in a criminal litigation; concerning an exclusive black male from the poorest city in Brevard County and marijuana. Tay issued his Motion to proceed in forma pauperis with the Middle District – Orlando Division and submitted his complaint as Certified Mail to the U.S. Attorney General Orlando Office on December 10, 2012 and the FBI – Jacksonville Division on January 11, 2013 which was received on January 14, 2013 by them, and this complaint was never proceeded or litigated, none of the named defendants were never arrested, and the FBI and or the Middle District – Orlando Division never contacted Tay for proceedings in the criminal complaint. On about March 20, 2013 Tay received a March 15, 2013 Report and Recommendation by Magistrate Gregory Kelly recommending Tay’s Motion to proceed in forma pauperis be denied, to dismiss his complaint with prejudice and directed the Clerk to close the case after about 3 months of filing because he “lacks standing to initiate criminal proceedings because the “government, not private citizens, prosecutes crime” to further



intentionally inflict emotional and mental distress upon Tay's livelihood and pursuit of justice. Tay called the FBI – Jacksonville office and spoke to agent Crystal (last name unknown) at about 4:15 p.m. to verify the investigation of his case. She stated to Tay that, "that information is confidential" and she could not and did not notify Tay of his complaint being executed, in which she took Tay's name and email for reference that she spoke to Tay.

2. *Class Action Complaint*

444. Tay authored and commenced a class action complaint by sending the District Court Southern District of Florida - Miami Division's [hereinafter, Miami Division] clerk office his complaint and other papers on August 9, 2013 pursuant to Fed. R. Civ. P. Rule 3. Enclosed were the Civil Cover Sheet, Motion for Informa Pauperis, the initial Complaint, Evidence Affidavit, Oath and Declaration, the evidence attachments, Notice of Pendency and Other Actions, (2) summons for Defendant, NEIL DASH, and the likewise Complaint and attachments. Tay's relief includes a medical marijuana act for Florida. Tay was also a member of another class action lawsuit<sup>137</sup> in the same court and individually filed his Notice of Appearance, an Emergency Motion for Special and Compensatory Relief, and a Notice of Pendency and Other Actions which were all sent together.

a. Tay's Class Action Complaint against 70 Defendants in the Southern District of Florida – Miami Division conspired with Middle District of Florida - ORL Division.

445. The Miami Division received Tay's USPS Priority Mail package on August 12, 2013 around 1 p.m. Tay checked the Miami Division's civil filing docket online from August 12, 2013 - August 15, 2013 and his case was not docketed. Tay called the clerk's office in reference to this complaint (i.e. *Tay v. Obama et. al.*) and was transferred to Tiffany Pete.

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<sup>137</sup> CASE NO.: 12-CV-23848- O'SULLIVAN in which he had to settle for about \$3.11.



Tiffany Pete said that Tay's case is a big case and that he mistakenly sent his complaint to the Miami Division and that his cover sheet said Brevard and that's why they did not docket it. She said that Miami has no jurisdiction for Tay's class action complaint because he is from Brevard. Tay explained to her that "Brevard is only listed as to what county is Plaintiff from, the Jurisdiction is broad because the Defendant(s) are government and or State agencies pursuant to 28 USC s. 1346, in addition to the Middle District - Orlando Division being a named Defendant would prejudice his case if he filed the class action complaint in the Middle District – Orlando Division.

446. Tay further explained to Tiffany Pete that he cannot help who his defendants are, what the facts state, what the evidence proves and the terminology used. Tiffany Pete told Tay that she doesn't know the Fed. R. Civ. P. and would have to look at the Rules to process Tay's case. Tay told her that she is a Clerk for the United States Federal Court and she should know the Rules like the back of her hand as she deals with complaints and the Fed. R. Civ. P. every day.

447. Pursuant to the Fed. R. Civ. P. Rule 5(d)(4) the Clerk<sup>138</sup> must file the complaint upon reception. Tiffany Pete stated that his case would be transferred to the Middle District - Orlando Division and that he did not have to pay for postage. Tay called the Miami Division's Clerk office again in reference to his other class action complaint that he is a member of (*Rodriguez v. Hyat, Hyat, and Landau*) and Clerk (Autumn) told Tay that there's nothing docketed from him for that case. Autumn began to frustrate and irritate Tay with questions such as: when did Tay send it; where did he send it; did he put the case number (which he did) and then got transferred to Tiffany Pete. Tiffany Pete said that Tay's complaint is on here supervisor's desk and her supervisor's office were locked but she'll go

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<sup>138</sup> In violation of the Code of Ethics for Judicial Employees § 320, Canon 1, 2, and 3.



unlock it to see Tay's case. Tiffany Pete began to ask Tay the same and other similar questions such as Clerk-Autumn did. Tay told Tiffany Pete that she has him going in circles when he only asked why his cases from either his initial class action complaint and or his class action Notice of Appearance were not docketed. Tiffany Pete and the Southern District of Florida Miami Division [USDOJ] deprived Tay his right to sue, have violated his due process and equal protection rights, and has delayed he and other class action members adequate and or the requested relief. Tay has been in litigation over 4 years in the Middle District - Orlando Division while indigent on Food Stamps living in an torturous and abusive residence through weapons of mass destruction and other forms of verbal and non-verbal schemes and or communications.

448. These acts by Tiffany Pete and the Southern District of Florida - Miami Division are unlawful and deprives Tay individually and as a protected black male class member his constitutional, civil and adequate living rights through depriving him his right to sue or commence an action pursuant to Fed. R. Civ. P. Rule 3 in its original filed jurisdiction.

449. On August 9, 2013 from the Cocoa Village USPS mail center, Tay sent Defendant a commenced action pursuant to Fed. R. Civ. P. Rule 3 paying a total of \$24.40 for (2) Priority Mail packages including: (1) 6 lb. 13.7 oz. and (1) 6 lb. 15 oz. at \$12.20 per Priority Mail package which arrived at Defendants address on August 12, 2013 at approximately 1 p.m.

450. **August 15, 2013:**

- a. 3:04 p.m.: Tay called Defendant, pressed 0, and spoke to an unknown Clerk. Tay referenced his initial class action Complaint filing (i.e. Tay v. Obama, et al.). Tay was put on hold and then transferred to Tiffany Pete (Defendant). Tiffany Pete told Tay that his case was huge and that he mistakenly sent his complaint to the Miami



Division because his Cover Sheet said Brevard. Tay indicated to Defendant that Brevard were only listed as the county in which he is from to properly complete the Cover Sheet form. She told Tay to give it a couple of days as they would send and transfer Tay's class action complaint to the Middle District. Tiffany elaborated on the process of filing and receiving a Docket number after the case is transferred to the Middle District who will then give Tay a case number. The duration of this conversation was 7 min. 47 sec.

- b. 3:36 p.m.: Tay called Defendant, pressed 0, and spoke to an unknown Clerk (Autumn). Tay referenced his pending class action Complaint (*Rodriguez v. Hyat, Hyat, Landau*) filing his Notice of Appearance and Motion for Emergency Relief. Tay referenced to the clerk the case number and asked was there a Notice of Appearance and Motion from Tay. The Clerk (Autumn) then hung up on Tay.
- c. 3:38 p.m. Tay called Defendant, pressed 0, and spoke to an unknown Clerk (Autumn). Tay told Autumn that he was just hung up on as he referenced his case for an unknown reason. Tay again referenced his pending class action Complaint (*Rodriguez v. Hyat, Hyat, Landau*) filing his Notice of Appearance and Motion for Emergency Relief. Tay referenced to the clerk the case number and asked was there a Notice of Appearance and Motion from Tay. The clerk apprehensively told Tay "No" and started to aggressively ask Tay questions such as when did Tay send it; where did he send it; did he put the case number (which he did). Tay explained that his Notice and Motion were received by the Defendant on August 12, 2013 around 1p.m. and that his initial Complaint and other papers should be docketed. Tay answered every question with frustration, as Autumn then got angry with Tay for informing her on



what the Defendants possess from him. Autumn then said “let me transfer you to my supervisor because I can’t help you” who then transferred Tay to Tiffany Pete.

Tiffany Pete asked the same and or parallel questions as Autumn such as when did Tay send it; where did he send it; did he put the case number (which he did). Tay became unprofessional to the Defendant as she told him a chain of lies such as: his complaint is in the mail room waiting to be transferred; his complaint is in her Supervisor’s office on her desk and her office is locked; and then she doesn’t know where it is. Tay informed her that he followed the class action guidelines to entering an appearance from Hyat, Hyat and Landau:

Entering an appearance:

Any class member who desires to enter an appearance pursuant to Rule 23(c)(2)(B)(iv) must do so by August 29, 2013. To do so you must file with the Clerk of the Court a written notice of your appearance and you must serve a copy of that notice, by certified mail, fax, or hand delivery, upon Class Counsel and Defendant’s counsel at the addresses set forth below.

451. Tay explained to Defendant that is what he did which Defendants knew and should’ve known by them possessing Tay’s papers. As Tay began to refer to the Fed. R. Civ. P. in his defense, Defendant stated “I don’t know the Fed. R. Civ. P. and I would have to look them up, I’m not an attorney” Tay replied, “Are u serious? You’re a Clerk of the United States Federal Court and you deal with cases every day, c’mon boo represent the United States judicial system”

- a. Defendant: “Please don’t call me boo.”
- b. Tay: “I sincerely apologize, its part of my culture. I didn’t mean any harm, and again I apologize.”



- c. Defendant: "It's ok just don't call me that."
- d. Tay: "But seriously, you're a Clerk of the Federal Court and you don't know the Rules of Procedure and you're in the position to supervise?"
- e. Defendant: "Do you have a number where I can reach you to discuss the process of your documents?"
- f. Tay: "No. I'm homeless. All I have is email."
- g. Defendant: "The phone your on now can you give me that number?"
- h. Tay: "Nope. I'm homeless. All I have is email." "As a matter of fact, this is what we'll do, let's make it date. This is what I'll do, I'll call you at 9:00 a.m. and we'll discuss what we need to discuss."
- i. Defendant: "That's too early. You gotta give me time to put my purse down."
- j. Tay: "LOL, what? Your purse? This is my life and a class of other black males and other citizens in the State of Florida and or the United States of America your hurting and you want me to give you time to put your purse down? C'mon man?"

452. Defendant and Tay agreed for him to contact Defendant around 9 a.m. on August 16, 2013.

453. On **August 16, 2013** 9:22 a.m.: Tay called Defendant, pressed 0, and spoke to an unknown Clerk who he asked to transfer to extension 5251 (Tiffany Pete). Tiffany Pete did not answer and Tay left a message concerning the previous conversation on August 15, 2013.

454. On **August 19, 2013**, Tay called the Defendant and left a message on her voicemail. Defendant returned Tay's call and left a message on his voicemail to confirm Tay's Complaint and other papers were Fed Ex'd to the Middle District – Orlando Division and





that the Middle District – Orlando Division received the Complaint Package around Friday August 17, 2013.

455. On around August 22, 2013 Tay received an Order from the ORL Division and Senior Judge G. Kendall Sharp to reassign his case to another District Judge, and not informing Tay on what judge it was reassigned to.

456. On around August 24, 2013 Tay received a Report and Recommendation from U.S. Magistrate Gregory Kelly stating that Tay “and his sundry claims are no stranger to this Court...”, “Although the six-hundred and thirteen (613) page complaint is largely “utter nonsense”... “Tay is a vexatious litigator and the balance of the Complaint is patently frivolous... (district courts have inherent power to dismiss frivolous lawsuits with prejudice, without prior notice to the parties).

457. Magistrate Kelly also RECOMMENDED that 1. The Complaint be dismissed with prejudice; 2. All pending motions are **DENIED** as moot; and 3. The Clerk be directed to close the case.

### *3. Seattle Complaint*

458. On January 7, 2014, Tay filed a civil complaint entitled *Tay v. United States of America et al.* in the Western District of Washington – Seattle Division. [Seattle Court]

459. Seattle Court held Tay’s complaint for about 3 months before he contacted them. Richard Jones then issued a corrupt and fraudulent Order stating that “The court has no idea why he [Tay] is suing these Defendants... No Defendant could be expected to respond to this complaint, because no Defendant would be able to determine what claims Plaintiff has stated.” And most damaging, “because the complaint is much too long, the court declines to



review it in detail. The court's preliminary review suggests that much, if not all, of the complaint is frivolous."

460. Tay was then ordered to show cause why the court should not dismiss his case without prejudice for failure to state a claim. Tay had until April 16, 2014 to respond with an amended complaint of fewer than 40 pages.

461. Tay then filed a motion for an extension of time. The Seattle Court granted same on April 18, 2014 stating that Tay has until April 28, 2014 to reply.

462. Tay complied and sent his 35 page Complaint to the Seattle Court by, and or on April 28, 2014. The Seattle Court then sent Tay's Complaint packet back to him without postage dates or fee paid.

463. On May 5, 2014 Tay called Seattle Court Clerk's Office and spoke to a name unknown clerk. The unnamed clerk requested Tay's case information and then transferred Tay to Consuella [Judge Richard A. Jones Secretary]

464. Tay sent a letter and the Complaint to Seattle Court and Richard Jones stating that his complaint was sent back to him. The Seattle Court said Tay did not and had no means of proof that he did, "...and will not devote further resources to the issue."

465. Tay again sent his Amended Complaint to the Seattle Court, and once again they returned it to Tay. Tay now has a civil cover sheet stamped by the Seattle Court on April 28, 2014 (which were tampered with white-out to cover the stamped date of receipt) and again on May 12, 2014.

466. Tay again sent his Amended Complaint Packet to the Seattle Court by Certified Mail and Return Receipt. On June 18, 2014 Richard A. Jones and the Seattle Court stated that "...the court is firmly convinced, moreover, that Plaintiff would not state a claim against any of



these Defendants even if the court gave him another opportunity to amend his complaint.”

The Seattle Court then dismissed Tay’s case pursuant to 28 USC 1915(e)(2)(B) stating that Tay’s Complaint “... fails to state a claim upon which the court could grant relief and that the complaint is frivolous.”

467. The Defendant knows and should’ve known that Tay was indigent and could not afford to mail papers through the mail in the 14 day limit to file an objection from the date of the Order and not the date when Tay received the Order. Tay filed the motion for electronic case filing and an honorary law degree from FAMU Law due to his indigence and the court still denied Tay access to the court and equally protects him as a licensed attorney with resources including money and adequate living.

468. The Smith Litigation Court and Justices knowing and intentionally obstructed justice while Tay suffers damages pursuant to 18 USC §§ 3 and 4.

*9. Defamation Scheme<sup>139</sup>*

469. The United States and the State knew Tay had the likeness of Nino Lyons and targeted Tay’s Exclusive Image and Likeness, Name and Likeness and Property as they did Nino Lyons through a nefarious scheme to deny him employment as a substitute teacher based on a falsified drug test pertaining to marijuana so that Tay can be an alleged co-conspirator in an illegal “underground drug-operation” and or Tay Tay Terror Attack to place and or return Tay to peonage and or slavery and or to traffic Tay through the Tay Tay Terror Attack as a involuntary slave trade in poverty, steal his money and convert his money for public and private use [“Dirty Money” and or financial transactions<sup>140</sup>], and forced him into involuntary

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<sup>139</sup> Pursuant to Fla. Stat. § 784.048.

<sup>140</sup> These terms are stated with the meaning of financial transactions as defined in 18 USC § 1956(a)(4) on, before and or after February 9, 2009 pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack in converting Tay’s money to public and private use under fraudulent pretenses and or



servitude for forced labor with respect to the Orders denying Tay his due relief, and documents concerning his drug test from LabCorp and Neil Dash for employment with the School Board and the State.

470. The United States and Search Engines willingly and knowingly published and or republished the intentional infliction of emotional distress of Tay's Exclusive Name and Likeness and Property as a co-defendant in a federal criminal litigation to maliciously induce, deceive and mislead the public that Tay's Exclusive Image and Likeness, Name and Likeness and Property are a threat and nuisance to any working environment due to his Image and Likeness, Exclusive Name and Likeness and Property, religion, culture, and or disability through the Tay Tay Terror Attack as the most dangerous negro in America, an E Terrorist and a Dope Boy from Cocoa.

471. Tay later searched his name in Search Engines [www.bing.com](http://www.bing.com), [www.msn.com](http://www.msn.com), [www.google.com](http://www.google.com) to see what results would appear for the public to view. First listed is Tay's personal website when he ran for Mayor, his facebook page, his closed twitter account and then a couple of links later there are embarrassing official documents of Tay's name being slandered and defamed by the Middle District – Orlando Division (See Smith 2009 Sham Litigation, Doc. 56) on Justia implying to the public that "Tay is an uneducated Dope Boy from Cocoa that is unqualified to teach in [Florida's] public schools" and being denied and rejected by the Federal Court, the Court of Appeals, and the U.S. Supreme Court on [www.justia.com](http://www.justia.com) with Orders or case closings along with other positive background history

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representations and or conclusions on, before and or after February 9, 2009 and depositing funds in financial institutions as defined in 18 USC § 1956(a)(6) to benefit and benefit financially with proceeds, as defined in 1956(a)(9), from the Tay Tay Terror Attack and or Tay's Self Made American Dream and or employment to be a substitute teacher on, before and or after February 9, 2009 Tay Tay Terror Attack on, before and or after February 9, 2009 pursuant to 18 USC § 1956(7) in violation of 18 USC §§1341, 1343, 1344, 1346, 1347 and 1349 pursuant to and in violation of 18 USC § 1581(a).



on other websites such as <http://www.corporationwiki.com/Florida/Cocoa/dontavious-smith-P5444295.aspx> and [www.thefamuanonline.com/news/view.php/774769/Alumnus-aims-to-be-mayor+&cd=2&hl=en&ct=clnk&gl=us](http://www.thefamuanonline.com/news/view.php/774769/Alumnus-aims-to-be-mayor+&cd=2&hl=en&ct=clnk&gl=us)<sup>141</sup>.

472. Search engines Google, yahoo, bing [Microsoft] and msn [Microsoft] have aided the Defendants and or RICO Defendants in defaming Tay's Name and Likeness with publishing results of Tay's Name and Likeness with fraudulent judgments and abuse of power of the courts to return and or place Tay in poverty.

473. The United States are a member and or user of the Justia.com service and are binded by the TOS Agreement and Privacy Policy. Justia collects personal information in three ways - through information provided directly from our users, from information collected through web server logs and through cookies. Tay is not a member of justia.com but is a user of the service. Tay is binded by the Justia Terms of Service ("TOS") Agreement.

474. The United States are entirely responsible for all Content concerning Tay's Exclusive Name and Likeness that Justia and the Justia Media Group uploaded, posted, emailed, transmitted or otherwise made available via the Service on and around December 1, 2009, and or on and after April 1, 2010.

475. Public humiliation through social media including but not limited to [www.msn.com](http://www.msn.com), [www.bing.com](http://www.bing.com) and [www.justia.com](http://www.justia.com) on the grounds of a falsified drug test, a false and defamatory statement that Tay "is not qualified to teach in Florida's public schools," and that Tay is "a vexatious litigator;"

476. Justia shares a co-branding agreement with advertising and or social media brands such as Facebook, twitter and LinkedN (hereinafter "Justia Media Group") using Share Buttons

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<sup>141</sup> Has been since removed upon Tay contacting FAMU's General Counsel for Notice of Intent to file a lawsuit through electronic mail





(hereinafter “Social Media Share Buttons”). Certain Justia services and content are co-branded with another company. If one registers for or use such services, both Justia and the other company or party may receive information collected in conjunction with the co-branded services. Justia and Search Engines received incorrect information from the United States about Tay’s Exclusive Name and Likeness and Property and published it on and around April 1, 2010 (April Fool’s Tay Tay Terror Attack). In such cases, either a joint privacy statement or a link to the other company’s privacy statement will be provided, which will provide you with information about how the other company will use the information and how you can contact the other company with requests to access the information or other inquiries.

- a. Justia, and its subsidiaries, affiliates, employees, information providers, partners, licensors, agents, co-branders, officers, directors, owners and employees, including but not limited to twitter, facebook and Google+ (hereinafter “Justia Media Group”) are responsible for the Content that the United States submitted to them concerning Tay’s April Fool’s Tay Tay Terror Attack with information that Tay was “not qualified to teach” and that his complaint was “utter nonsense” on their website.

## *2. Social Media Scheme*

477. Tay’s federal court case dockets were shared and viewed on various Search Engine and Social Media sites through the State and United States..



478. "Search Engines"<sup>142</sup> means and includes Defendants and co-conspirator non-Defendants and non-Defendants including but not limited to; Justia.com, bing.com, yahoo.com, facebook.com, youtube.com and Google.com. Search Engines automatically scans (or "crawls") the internet to develop and maintain an index to generate and display a set of search results (the "displayed search results"). The index is really a catalog of available online resources, including websites, images, videos, documents, and other items. Particular displayed search results are created by using a computer algorithm to match the search terms you enter with results in the Search Engines index. Search Engines design algorithms to provide the most relevant and useful results and determine which displayed search results appear for any given search.

479. Tay is a member of FACEBOOK. To become a Member of facebook.com, a person must register a profile. FACEBOOK requires its Members to submit their names, email addresses, birth dates, and gender at the time of registration. Members may upload a FACEBOOK Profile Photo-often, a photograph of themselves-which is viewable by anyone, regardless of whether they are a Member or not. Defendants are members of FACEBOOK and or have FACEBOOK profile pages.

480. Tay registered with FACEBOOK with his dontavious1.smith@famu.edu and flanative\_03@hotmail.com as login information to access his FACEBOOK Profile.

481. After joining, a Member gets an F ACEBOOK "Profile" ("Facebook Profile") page. Within this Facebook Profile page Members can see, among other things, a Facebook "News Feed" and a "Wall" ("Facebook Wall").

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<sup>142</sup> A software system that is designed to search for information on the World Wide Web; The search results are generally presented in a line of results often referred to as search engine results pages (SERPs). The information may be in web pages, images, information and other types of files and or formats.





482. FAMU possess Tay's Trade Secrets through his email account dontavious1.smith@famu.edu from FACEBOOK every time Tay receives a FACEBOOK notification.
483. Tay utilized a FACEBOOK application to receive text messages from his FACEBOOK Profile to his Sprint cellular phone for notifications on his wall postings and personal messages in his inbox.
484. All decisions as to the content of the Terms of Use, content of the Statement of Rights and Responsibilities, and the decisions as to whether or if to gain consent from Members for their use in Sponsored Stories, were made in FACEBOOK's California headquarters by FACEBOOK executives and employees. All decisions as to how to implement and market the Sponsored Stories advertising campaign were also made in FACEBOOK's California headquarters by FACEBOOK executives and employees.
485. Tay was a registered member of Twitter on or around April, 10 2009 with the member name @321CocoaBoss. Tay is no longer a registered member of Twitter, yet his profile page still exists online throughout Search Engines. The Defendants know that Tay has or had twitter accounts through Search Engines.
486. To become a Member of twitter.com, a person must register a profile. Twitter requires its Members to submit their names, email addresses, birth dates, and gender at the time of registration. Members may upload a twitter Profile Photo-often, a photograph of themselves-which is viewable by anyone, regardless of whether they are a Member or not.
487. Tay's Twitter account was hacked by John Doe when random post to his wall that Tay didn't post were posted as he had closed his account. Tay did not contact Twitter for account



issues and decided to close his account since he did not have access to twitter from a cell phone and because his account was hacked.

*i. Facebook Defamation<sup>143</sup> by it Members in a public forum pursuant to Fla. Stat. § 784.048*

488. On about July 12, 2014, while logged onto Facebook, Tay received a notification that he was mentioned in a comment made by Facebook member<sup>144</sup>, Eric Lamarr<sup>145</sup>. Tay clicked the link that led him to Eric Lamarr's public comment and or initial conversation in a public forum stating "Does any of my Rockledge friends know why Dontavious Tay Smith is filing lawsuits against Obama, Microsoft, and the rest of the world? Lol he wont answer me. So if u r friends with him from r school days, maybe u know? Its comical." This led to multiple comments which were initially started by Facebook member, Wanda Schultz, who Tay does not know, has never seen before and has never had a conversation with who initiated inquiry

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<sup>143</sup> In the law of defamation (libel and slander), a personage or likeness of great public interest or familiarity like a government official, politician, celebrity, business leader, movie star, or sports hero. Incorrect harmful statements published about a public figure cannot be the basis of a lawsuit for defamation unless there is proof that the writer or publisher intentionally defamed the person with malice (hate). Though a website is generally protected from suit over content originating with a third party user, under the Communications Decency Act's Section 230, the defamation arises from the Tay Tay Terror Attack which was devised on, before and after February 9, 2009 pursuant to the March 5, 2009 Document with harassing and bullying remark toward Tay and his litigation history pursuant to the March 5, 2009 Document. Tay notified Facebook that he did not like this post and it was harassment toward him wherefore submitting the review to Facebook and unfriending Eric Lamarr. Therefore Facebook knew and or should've known that they were devising a public forum and data information scheme to intentionally harm Tay through cyberharassment; pertains to threatening or harassing email messages, instant messages, or to blog entries or websites dedicated solely to tormenting an individual, and or cyberstalking; the use of the iinternet, email or other electronic communications to stalk, and generally refers to a pattern of threatening or malicious behaviors such as the Facebook Defamation pursuant to the March 5, 2009 Document and internet search engines of Tay's likeness in a false and negative light pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack pursuant to and in violation of Fla. Stat. § 784.048.

<sup>144</sup> At that particular time not knowing and or friends with Facebook member Wanda Schultz, who on this day at 11:23 a.m. made a random post... "Anybody know Dontavious?" that Tay did not see until after defamatory acts and statements were made about him causing him distress.

<sup>145</sup> Eric is Tay's 2003 classmate from Rockledge High School.



about Tay making the comment<sup>146</sup> “I am sharing this because inquiring minds need to know!” [hereinafter, “Eric Lamarr’s Conversation Defaming Tay”]

489. This conversation received quite a few comments, shares and “Likes.” Tay even selected the Like button on the conversation about him. Most comments were made about Tay and or remarks intentionally inflicting distress upon him and using Facebook as a public forum to slander Tay’s character, were mostly from Tay’s Rockledge High School classmates, who were mostly white males and white females around the age of 30. Some of the Eric Lamarr Conversation Defaming Tay participants haven’t even contacted and or attempted to contact, has had in depth relationships to contact any of those participants<sup>147</sup>.

490. From Wanda Schultz comment created multiple comments which were an insult to Tay, his livelihood and Name and Likeness to be taken as some sort of joke.

491. Another Facebook member and another one of Tay’s Rockledge High classmates, Geoff Lowdermilk used Google to share Justia’s webpage from his AT&T iPhone in the conversation.

492. After Tay replied Eric Lamarr’s Conversation Defaming Tay emotionally, another one of Tay’s Rockledge High classmates, Megan Philman-Pace (“Megan”), who has been “hating” on Tay and his case since he advertised on Facebook that he were in litigation and being damaged every day by the Government. Megan made continuous insults to Tay within the

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<sup>146</sup> Wanda supposedly mentioned (linked up) Eric Lamarr to conspire to defame Tay’s Name and Likeness and cause him further intentional infliction of emotional distress.

<sup>147</sup> Though Tay and Eric Lamarr Conversation Defaming Tay participants are Facebook Friends, they are not Tay’s “Real Life” friends and Tay has probably had little, slight or if any contact with any of them since graduation from Rockledge High School and or Florida A&M University, running for Mayor of Cocoa in 2008 and being denied employment by the School Board of Brevard County in March 2009. Being Facebook Friends just gives individuals access to Tay and his personal page to inquire about and attempt to keep up with what’s going on in Tay’s life as he “post”, “comment”, “share” and “Like” comments and conversations concerning him.



Eric Lamarr Conversation Defaming Tay, and clicking the “Like” button to like other insulting and or defamatory comments by other Facebook Members.

493. Megan then made the most damaging and false comment anyone can ever make against a public figure and suffering Pro Se Plaintiff, Megan made the comment, “btw Tay since your about to get paid, Can I please get compensated for the gas card you stole in 2004 to get gas in Cocoa and by the County Line.”

494. Megan were negligent and knew those comments were false and would cause Tay severe harm when she made them publicly to defame Tay’s Name and Likeness. Tay were never the center of an investigation alleging he stole anything and or were never questioned from any law enforcement about any theft or robbery of a gas card being stolen from Megan by he in 2004 or thereafter, which is over 10 years ago.

495. Tay instantly responded to the comment describing means of filing a civil lawsuit against her. She then immediately erased the comment then therefore deleting Tay as her friend. Megan still had access to Eric Lamarr’s Conversation Defaming Tay due to her and Eric Lamarr and other Eric Lamarr’s Conversation Defaming Tay participants remaining to be friends, and continuing to participate in comments slandering Tay after befriendng him.

496. Almost instantly after Megan’s defaming comment(s) that Tay stole from her, Facebook member and again another one of Tay’s 2003 Rockledge High School classmates, Christian Polniak, commented in the Eric Lamarr conversation by offering Megan legal advice to allegedly sue Tay for Intentional Infliction of Emotional Distress. Facebook members who are and are not Tay’s friend have access to this damaging conversation, have and will continue to harm Tay and mislead the public about Tay though the conversation has been tampered and or edited.



### DAMAGES SUFFERED

497. A damaged Name and Likeness living in poverty and other spiritual, mental, livelihood, health, socio economic, entrepreneurial and financial damages [“damages”].
498. Due to the intentional discrimination and deceptive employer practices by the United States, the State and the School Board to deny Tay employment based on a falsified drug test because he is a black male, Tay’s alleged positive drug test results are in Brevard County’s [the State] custody as a public records, and are forced to continue relying on his food stamps by continuing to reapply every 6 months online ([www.myflorida.com/accessflorida](http://www.myflorida.com/accessflorida)) with the Florida Department of Children’s and Families and Chase as a single black, African American male living and sharing food with his grandmother. Tay was enslaved below the poverty line by the Defendants to rely on food stamps, the United States and his grandmother for food and shelter.

### COUNT 1 – SCHEME TO DEFRAUD

#### Pursuant to 18 USC § 1346

499. Defendants and or RICO Defendants engaged in, devised, and conspired in a American Dream scheme in violation of mail, wire, health care, bank and food stamp fraud pursuant to 18 USC § Chapter 63; including but not limited to education, entrepreneurship and employment setup for Tay to fail<sup>148</sup> and not obtain and or acquire his Self Made American

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<sup>148</sup> As declared and mentioned in the January 8, 1964 State of the Union by President Lyndon B. Johnson, the declared attack on Tay was designed for Tay to fail:

*“... Unfortunately, many Americans live on the outskirts of hope—some because of their poverty, and some because of theft color, and all too many because of both. Our task is to help replace their despair with opportunity.*

*This administration today, here and now, declares unconditional war on poverty in America. I urge this Congress and all Americans to join with me in that effort.*

*Poverty is a national problem, requiring improved national organization and support. But this attack, to be effective, must also be organized at the state and the local level and must be supported and directed by state and local efforts.*

*For the war against poverty will not be won here in Washington. It must be won in the field, in every private home, in every public office, from the courthouse to the White House...*



Dream, therefore viewing Tay as “the most dangerous negro in Cocoa, FL and or America<sup>1”</sup> pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack on, before and after February 9, 2009, including but not limited to deprive Tay of the intangible right of honest services on, before and after February 9, 2009 and March 5, 2009 pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack, including but not limited to Tay’s holistic health as codified in 20 USC § 7801(26)(A) and section (41); economic, social and cultural rights and privileges as a School Board substitute teacher applicant pursuant to 20 USC § 7801(3)(8)(10) to teach (11), to become a “exemplary teacher”... pursuant to sections (19) and (23) and receive knowledge (34) through the following acts:

- a. Extremely prejudicing Tay’s School Board substitute teacher application process to defraud Tay, the United States and its agencies on, before and or after February 9, 2009 and denying Tay employment on March 5, 2009 based on a falsified drug test with no enclosed and or attached results by way of pre – employment communication, including but not limited to emails from Tay and telephone conversations with the School Board and James Kasczkowski inquiring about substitute teacher employment prior to applying before February 9, 2009;

500. Tay were born to a man and a woman pursuant to 1 USC § 7 having a single mother being raised in his grandmother’s household as single parents (mother and grandmother pursuant to 42 USC §300z “Findings and Purposes”) to raise him without a father who were

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*Our chief weapons in a more pinpointed attack will be better schools, and better health, and better homes, and better training, and better job opportunities to help more Americans, especially young Americans, escape from squalor and misery and unemployment rolls where other citizens help to carry them.*

*Very often a lack of jobs and money is not the cause of poverty, but the symptom. The cause may lie deeper in our failure to give our fellow citizens a fair chance to develop their own capacities, in a lack of education and training, in a lack of medical care and housing, in a lack of decent communities in which to live and bring up their children...”*

*See <http://millercenter.org/president/speeches/detail/3382>*



on drugs and not around his upbringing as an adolescent child with known and or unknown disabilities as defined in 20 USC §1401 ('emotionally disturbed'<sup>149</sup>) with mental, moral and physical abuse from his residence due to his father's transgressions and unavailability and his mother's and grandmother's deeply rooted "vendetta" against Tay for his father's transgressions as defined in and pursuant to 42 USC § 3002(1)(A)(B) ("Definitions"; abuse).

501. Defendants and RICO Defendants, recruited, institutionalized, brainwashed, defrauded, trained, bamboozled and embedded Tay to become a exclusive public figure from Cocoa, FL, to "Trust In God" ["In God We Trust"] and to work hard to obtain his Self Made American Dream<sup>150</sup> (Stalley; Maybach Music Group) through representations<sup>151</sup> of the Defendant<sup>152</sup>.

502. Defendants and or RICO Defendants mesmerized, programmed and innovated Tay through the exploitation of him and his culture all around the world through television,

<sup>149</sup> Tay was and still is emotionally disturbed from being a black male growing up without a father or father figure to teach him how to be a man in a predominately woman dominated household or family, being abused physically and mentally at home by mother and grandmother and or aunties and uncles, being borderline obese and having bad eating habits, living in a crime – violent community, being trained to lie, deceive and manipulate others.

<sup>150</sup> Hip Hop artist Stalley of the Maybach Music Group underground mixtape; "*Savage Journey to the American Dream*" is more than a house, a wife, some kids, a gated fence and a dog. It is the personal "*AMBITION*" – Wale, Maybach Music Group. (2011) to display moralistic excellence in being able to enjoy life respectively with no worries, treating neighbors with common courtesy ("Classy Common Courtesy").

<sup>151</sup> Including, but not limited to the education and lifestyle culture in Florida, movies; sitcoms; internet; and music.

<sup>152</sup> Includes Defendant's logos, enterprises, institutions, transactions, documents, marks, message, products, events and likenesses associated with the representations; including, but not limited to: Deeply Rooted In the Community 365 Days A Year (McDonald's 365 Black), Become Legendary (Nike), Equal Opportunity Employer (State, School Board), Future of Florida's Space Coast (State, School Board, Brevard, NASA, Cocoa), Excellence with Caring (FAMU), Safeplace.. "The relations and duties involved need not be legal, but may be moral, social, domestic and merely personal." *Kaser v. Swann*, 141 F.R.D. 337, 341 (M.D. Fla 1991). *Tardit v. People for the Ethical Treatment of Animals*, 160 Lab. Cas. P61065 (M.D. Fla. 2010) (2:09-cv-537-FM-29SPC).



computers, internet, radio, wires, and other telecommunication and production communications to induce Tay to be a Man of God and an educated '*Hoodtrepreneur*'<sup>153</sup>.

503. Rap music and the hip hop music culture and or black celebrities who may and or may not come from a background such as Tay's and or Tay's livelihood are used as Defendants Weapons of Mass Destruction by Defendants and or RICO Defendants to sell their products or services<sup>154</sup> for Tay to be lured to and or coerced to purchase through the Defendants and or RICO Defendants marketing and advertising Tay Tay Terror Attack scheme before and after February 9, 2009.

504. Defendants and or RICO Defendants are exploiting many rap stars and or black celebrities [i.e. *Hoodtrepreneurs*] that target their black communities, such as Tay's, to sell their products which are harmful to Black and Latino communities, such as *Hoodtrepreneur's* having an interest in alcohol and or alcoholic beverage shares. Alcoholism is a major problem for the black community, such as the Diamond Square Community in Cocoa where Tay lives and or resides and or falsely enslaved to. There are hundreds of hip hop artists that contribute to the degradation of the African-American, Latino, White and Asian communities such as Rick Ross, Birdman, Nikki Minaj, Kanye West, 50 Cent, Lil Wayne and many others whose lyrics degrade women and glorify The Devil and or The Devil's agenda to rob, steal, kill and destroy people such as Tay to rebuke his Heavenly Father's 10 Commandments. They rap about how much money they have and all of the gold chains they possess. These are songs that have a hidden 'subliminal' message to consume marijuana, have relentless sex with a plethora of women, covet

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<sup>153</sup> Someone from a predominately African American neighborhood who owns and does business as an entrepreneur in those black neighborhoods. See (Movie) *Hip Hop Moguls: The Rags to Riches Stories of Ceo's of Rap* (2009).

<sup>154</sup> See also <http://www.forbes.com/sites/lancemadden/2012/12/05/spike-lee-is-still-the-best-nike-jordan-brand-pitchman/>.





another man's wife, drug trafficking, sexual assaults ("gang bangs or trains") on women, purchase fast cars and or luxury cars for glamour, take trips to the Caribbean and or exotic islands with a woman and or women who are not Tay's wife and or fiancé to have relentless sexual escapades and euphoria's, and or to replicate a "Gangster" and or a "Hood Nigga" and or a "Dope Boy" and or "Ugh Boss" and or "Mastermind" in which were the representations and or misrepresentations of the Defendants and or RICO Defendants wherefore engaged in a nefarious scheme to deny Tay employment with the School Board based on a falsified drug test to return him to poverty on, before and after February 9, 2009 pursuant to the March 5, 2009 Document. The [Defendants Weapons of Mass Destruction] used by the Defendants and or RICO Defendants pursuant to the March 5, 2009 Document on, before and after February 9, 2009 to keep certain segments of society in control, such as Cocoa Diamond Square – District 1 community where Tay is held as a modern day slave pursuant to the March 5, 2009 Document.

505.    Celebrity endorsements are a big part of the marketing and advertising of Tay's livelihood, the Defendants representations of the American Dream and or Equal Employment Opportunities, marijuana, religion sports and entertainment, social media, food and other consumer products, with as many as 20 percent of ads featuring a TV, film or sports star. Nowhere is the link between celebrity and product endorsement more evident than in the black community, especially with the promotion of certain merchandise by rap artists pursuant to the Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.



506. Microsoft is a corporation that Jay-Z, a *Hoodtrepreneur*, represents [Decode; [www.bing.com/jayz](http://www.bing.com/jayz)] founded by Bill Gates who owns a nonprofit has called the Bill & Melinda Gates Foundation.

507. Defendants and or RICO Defendants misled and deceived Tay through illuminati of rap music and other communications so that Tay can sell his soul to The Devil<sup>155</sup> to be “**Perfectly Possessed**”<sup>156</sup> to the Tay Tay Terror Attack to eliminate Tay generally by using Defendants Devices, the March 5, 2009 Document, Defendants Weapons of Mass Destruction<sup>157</sup>, and Obama’s broken promises to target and initiate an ambush of by way of the Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

508. Defendants and or RICO Defendants knew and or should have known that Tay was a child from a low income family and or a low income household pursuant to 20 USC §1021(3) while a student and or student athlete with the School Board pursuant to the Sunshine Connection and or *K – 20 Education Surveillance*. The Defendants and or RICO

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<sup>155</sup> The Devil is a supernatural spirit that is the personification of evil and the enemy of God and humankind and herein is the spirit of false and misleading deceptions and the illuminati in individuals and groups of individuals that provided, obtained and or benefitted from human labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

<sup>156</sup> See <http://thedogstar.com/secret-societies/illuminati/illuminati-hip-hop-industry/>; also <http://www.trutv.com/conspiracy/celebs/hiphop/gallery.all.html>; also

<sup>157</sup> Weapons are hereinafter defined in lieu of the pursuant law and are referred including but not limited to derivatives (the deadliest weapon on Wall Street), John Boehner and the U.S. Senate, political parties in the United States, racism and prejudice, financial institutions and the stock market, diseases such as anthrax and AIDs, viruses such as chlomeia, oil spills in the Gulf Coast of the United States, education and religious institutions, condoms, computers and computer applications, prisons, politics and politicians, alcohol, computer devices, television and radio broadcasting, pre-employment drug testing [Defendants Devices], and exclusively pursuant to the War on Drugs consistent to any Cannabis drug (marijuana), American Dream Contracts, Florida’s education Curriculum, sulfa and penicillin (Tay is allergic to these medications), STD’s and other virus’ scheme, food stamps, Certified Mail receipt, and also as defined in 18 USC § 1018; 18 USC § 1030(e); 18 USC § 1343; 18 USC § 3127(1)(3)(4) and exclusively pursuant to 18 USC § 2332f(a)(2) in the herein described 9-11 terror attack, the Tay Tay Terror Attack and other attacks in the herein on, before and after February 9, 2009 pursuant to the March 5, 2009 Document. See also <http://www.businessinsider.com/warren-buffett-q1-equity-index-puts-2013-5> and [http://www.cbsnews.com/8301-18560\\_162-4546199.html](http://www.cbsnews.com/8301-18560_162-4546199.html).



Defendants knew and or should've known that Tay were a 1<sup>st</sup> generational college student and or low income individual from Cocoa that attended and graduated from FAMU pursuant to 31 USC 5312(h)(3)(4) on before and after February 9, 2009 pursuant to the March 5, 2009 Document.

509. Defendants and or RICO Defendants induced, enticed and coerced Tay through Product Placement and or Product Marketing<sup>158</sup> in movies, sports, commercials, and including but not limited to other communications and publications pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack to purchase Defendants products and or services to obtain his Self Made American Dream.

510. Defendants and or RICO Defendants misled and deceived Tay with the motto "Deeply Rooted in the Community 365 Days a Year" pursuant to him graduating from a HBCU, running for Mayor of Cocoa, and the March 5, 2009 Document and or the Tay Tay Terror Attack to celebrate Tay's achievements in his African American community of Cocoa. Tay indulged and relied on FAMU's representations, and their deceptive and misleading advertising to be a drum major (Marching 100) in his community in the areas of education, employment, entrepreneurship, public service and entertainment believing that his indulgences in these areas were valuable human assets to his environment and community, and humankind. Within that indulgence and representations of Tay's Exclusive Name and Likeness being denied employment based on a falsified drug test and receiving food stamps, Tay was schemed upon to be falsely enslaved in Cocoa through the misleading advertising of Defendants and RICO Defendants.

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<sup>158</sup> According to the European Union "any form of audiovisual commercial communication consisting of the inclusion of or reference to a product, a service or the trade mark thereof so that it is featured within a programme." Product placement stands out as a marketing strategy because it is imperative to attach the utmost importance to "the context and environment within which the product is displayed or used."



*“We believe that you can change a child’s life, you can change a family’s, which can change a community, and ultimately the world<sup>159</sup>”*

511. The Defendants and or RICO Defendants knew or should have known, however, that they would not refund Tay’s’ money and or provide him relief from the services of the School Board and RICO Defendants in the March 5, 2009 Document and Tay Tay Terror Attack on, before and or after February 9, 2009 to obtain and or acquire his Self Made American Dream. The Defendants and or RICO Defendants knew or should’ve known Tay were authoring and or had authored literary works (including but limited to, *Hood Bred – Self Risin @ 365 Degrees*)<sup>160</sup>, community development plans, corporation proposals and contracts, and other Self Made American Dream Contracts and papers as a MSN Hotmail and Facebook account holder, education contracts, the Sunshine Connection pursuant to the *K-20 Surveillance*, CEO of a Florida S-Corporation, 2008 Mayor candidate and author before, during and after the March 5, 2009 Document and or the Tay Tay Terror Attack.

512. Based on these and other contractually-binding promises made to Tay regarding education (“Educations Contracts”) and work opportunities (“Employment Contracts” and or “Entrepreneurship Contracts”) in the United States and the State, Tay signed and or paid for contracts and or duties (hereinafter “American Dream Contracts”) at various points in early in his K- 20 education curriculum to the present with the Defendants and or RICO Defendants.

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<sup>159</sup> McDonald’s 365 Black vision.

<sup>160</sup> Tay’s literary work, *Hood Bred – Self Risin at 365 Degrees*, on, before and after February 9, 2009 generally was and is worth about \$500 million including but not limited to: profitable book publishing from online sales, bookstore and individual sales; movie deals; joint marketing contracts; merchandise; music soundtracks; literary, musical, dramatic, and choreographic works, and motion pictures and other audiovisual works, to perform the copyrighted work publicly and other entrepreneurial projects with his literary work pursuant to and or as defined in 17 USC § 106, 10 CFR 603.1285 and 32 CFR 37.1310.



513. Pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack on, before and after March 5, 2009 and April 1, 2010 the Defendants and or RICO Defendants dishonestly appropriated funds from Tay and the United States his whole life through the U.S. Department of Treasury and monetary notes simply by engaging in a confidence trick to have him the center of the Tay Tay Terror Attack. Tay had confidence that if he paid the necessary funds to go through the Defendants' education curriculum<sup>161</sup>, educational employment curriculum and entrepreneurial operation to do business with the Defendants and or RICO Defendants in the State, he would receive due diligence and an equal opportunity to enjoy life pursuant to obtaining his Self Made American Dream. The Defendants and RICO Defendants' trick was to groom Tay publicly and privately through his residence (or hostile living environment), low income and less educated community and or the public school system, have him go through life knowing he were going to have to rely on them for an equal citizen livelihood, and the natural born citizen process to receive the Self Made American Dream in fair form, but having premeditated and reckless intentions of permanently depriving him of those funds neglecting to hire him as a substitute teacher and other professional positions for other companies and not give him due process of civil litigation within the scheme.

514. Tay was denied his right(s) to: education; work<sup>162</sup> pursuant to FL. Const. 1 § 6; his right to self - organize (Fl. Const. § 447.03) through unfair labor practices (Fl. Const. § 447.501);

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<sup>161</sup> The math, reading, writing, comprehension, public relations, public speaking, performing arts, science, engineering, and other enrichments programs and curriculums from Tay's curriculum from the K-12 State education, FAMU and the RICO Defendants.

<sup>162</sup> Article 23.1 of the Universal Declaration of Human Rights states: "Everyone has the right to work, to free choice of employment, to just and favorable conditions of work and to protection against unemployment."



freedom of religion<sup>163</sup>; privacy; access to basic, essential goods and services: adequate food, clothing, shelter, health care, education, public utilities, water and sanitation; safety; consumer education; a trial by jury; to redress being discriminated against and denied employment as a substitute teacher; to be informed; and a healthy environment<sup>164</sup>; access personal transportation and the enjoyment of life, liberty and the pursuit of happiness<sup>165</sup> by the Defendants and or RICO Defendants pursuant to 20 USC § 1021(3)(23).

515. Tay's Name and Likeness and Property was in the care of the Defendants and RICO

Defendants, they had a duty of care to Tay to protect him from being harassed, misled, deceived and discriminated by the School Board. Likewise, the Defendants and or RICO Defendants are responsible for supervising, disciplining, controlling and protecting employees and applicants in its control, custody, possession and care, which it failed to do.

516. Defendants and or RICO Defendants conduct was so reckless or wanting in care that it constituted a conscious disregard or indifference to the life, safety, or rights of Tay exposed to such conduct on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

517. Tay had an extreme amount of trust and confidence in the information provided to him through the Defendants and or RICO Defendants misleading marketing and advertising in on, before and after February 9, 2009 pursuant to the March 5, 2009 Document forming the duties of trust, honesty, due diligence and integrity for his life in obtaining employment as a

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<sup>163</sup> Article 18 of the Universal Declaration of Human Rights, which includes his right to consume marijuana for medicinal necessity. See *Jenks v. State of Florida*.

<sup>164</sup> See The Consumer Bill of Rights

<sup>165</sup> Article 3 of the Universal Declaration of Human Rights reads, "Everyone has the right to life, liberty, and security of person."



substitute teacher and or employment generally to become successful by Defendants and RICO Defendants on, before and after February 9, 2009.

518. The Defendants and or RICO Defendants individually, jointly, fiduciary, socially and materially owed Tay a duty of care on, before and after February 9, 2009 pursuant to the March 5, 2009 Document to carry out their responsibilities in exercising the degree of care, skill and diligence that ordinarily prudent persons in like positions would use under similar circumstances in Tay Tay Terror Attack.

519. At all relevant times herein, Tay had a right to privacy under the 4<sup>th</sup> Amendment U.S.C. not to be deprived of his constitutionally protected interest in his career to have the “enjoyment of life and liberty.” Pursuant to the March 5, 2009 Document and the Tay Tay Terror Attack, Defendants and or RICO Defendants willingly and knowingly violated Tay’s right to privacy, and used the March 5, 2009 Document to hold Tay’s product [Florida Chain of Custody on February 23, 2009, and Name and Likeness] in a false light after March 5, 2009 yet scheming for Tay to be deprived his right to education and employment on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

520. The School Board, State, Microsoft, LabCorp, Neil Dash and RICO Defendants owed Tay the duties to protect Tay’s Data Info and to provide him an Equal Employment Opportunity, those duties was breached through the herein Tay Tay Terror Attack to deny Tay employment as a substitute teacher. The Defendants and RICO Tay Tay Terror Attack of compromising Tay’s Data Info to the public caused Tay severe injury on, before and after February 9, 2009. Tay’s Damages are the actual damage or loss of his personal information and property of his Name and Likeness, including but not limited to losing contacts and personal information, and delayed his litigation complaints in State and Federal court with



contact with United States citizens, celebrities and or government officials in the public and private interest; to receive employment and investment information. The School Board and the State failed to evaluate the procedures of the Defendants and or RICO Defendants pertaining to Tay's Exclusive Name and Likeness pursuant to Fl. Stat. 1012.34 and failed to properly train and supervise the School Board's and the State's employees for Tay's employment procedure as a substitute teacher on, before and after February 9, 2009 pursuant to the March 5, 2009 Document;

521. Defendants defrauded and attempted to defraud Tay's urine test inconclusively with a controlled substance such as, marijuana on, before and after February 9, 2009 by the overt acts in his employment procedure pursuant to the Tay Tay Terror Attack pursuant to 18 USC § 1365 (Tampering with consumer products), 18 USC § 1518 (Obstruction of Criminal Investigations of health care officers), and 18 USC § 669 (Theft or embezzlement with health care), §1515(a)(3), Title 18 USC §§ 241 and 371.

522. Pursuant to 18 USC §§ 1341 ("Frauds and Swindles"), 1346 ("Scheme or Artifice to Defraud") §1347 ("Health Care fraud") and § 1343 ("Fraud by wire, radio, or television") Defendants and or RICO Defendants devised and engaged in a nefarious scheme to deny Tay employment as a substitute teacher with the School Board based on a falsified drug test and or Florida Chain of Custody form to defraud his Florida Chain of Custody pre employment drug test and a Equal Employment Opportunity through an employment hoax on, before and after February 9, 2009 to return him to a condition of poverty with the intent for Tay to be arrested on Dope Boy charges with the intent of placing him or returning him to a condition of peonage to devise the Tay Tay Terror Attack and or the March 5, 2009 Document to defraud Tay and the United States and its agencies for obtaining Tay and the United States





and its agencies money and property by means of false and fraudulent pretenses, representations and promises of a Equal Employment Opportunity, including but not limited to the purpose of a Florida K-20 Education system, and the School Community Professional Development pursuant to Fl. Stat. 1012. 98 (“School Community Professional Development Act”) transmitted by means of the Microsoft Licensing Agreement and the Sunshine Connection scheme by means of wire, radio, and or television communication in interstate or foreign commerce any writings such as, the Tay Tay Terror Attack marketing and advertising scheme to coerce and force Tay to indulge in Florida’s K-20 education curriculum and to become an Exclusive Name and Likeness pursuant to acquiring and obtaining his Self Made American Dream pursuant to the March 5, 2009 Document and the Tay Tay Terror Attack<sup>166</sup>.

523. The Defendants mastermind scheme were to rob, steal, kill and destroy<sup>167</sup>; torture Tay and to fraudulently invade his privacy and steal his intellectual property (32 CFR 37.1310 and 15 USC § 1127) (hereinafter, “Tay’s Intellectual Property”) through terrorist acts through Defendants Devices with malicious and fraudulent acts in the Tay Tay Terror Attack pursuant to the March 5, 2009 Document and the Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

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<sup>166</sup> On, before and after March 5, 2009 by and through the March 5, 2009 Document and or the Tay Tay Terror Attack, Tay was denied employment based on a falsified drug test because of Tay’s Exclusive Image and Likeness. This was a scheme in retaliation of Tay’s Exclusive Image and Likeness as a Never Ignorant Getting Goals Accomplished (“NIGGA”) from Cocoa, a student athlete with the School Board and a prominent student leader at FAMU, and running for Mayor of Cocoa in 2008 at 23 years old being Central Florida’s youngest African American male Mayor candidate, and or being Tay’s Exclusive Image as a black male from Cocoa through the Tay Tay Terror Attack (FL. Stat. § §163.502, 1004.65, 1012.98; and Cocoa municipal ordinance 15-5). FAMU, the Defendants and RICO Defendants knew and or should have known that he was the target of the Tay Tay Terror Attack which they received profit from to use Tay’s Exclusive Image and Likeness as a hidden slave in Cocoa, the State and United States.

<sup>167</sup> Holy Bible, John 10:10; the thief comes only to steal and kill and destroy; I (God) have come that they may have life, and have it to the full.



524. Defendants and or RICO Defendants forced Tay into voluntary and involuntary servitude as a sex slave on, before and after March 5, 2009 pursuant to the March 5, 2009 Document and the Tay Tay Terror Attack including but not limited to: pornography, masturbation, adultery, prostitution on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

525. Tay Tay Terror Attack forced Tay to be evicted while a student at FAMU, car repossession, cellular service cancellation, credit card debt, academic and employment failures, STD (Chlamydia), appendectomy surgery (food, alcohol and drug abuse) on February 13, 2007 by Dr. Amit Gupta at Capital Regional Medical Center, to purchase consumer products that are and were advertised and marketed to Tay through television, email, internet, radio and text messages, alcohol and drug abuse (marijuana), to be a defendant in civil lawsuits, and to settle for pennies on a dollar in class action lawsuits that he could and or could not cash at any financial institution in his vicinity due to not having a bank account to make transactions in which Tay were a party.

526. Defendants and or RICO Defendants caused Tay to subscribe to free online porn email, newsletters, videos and pictures so that he could “jack his dick” (masturbating) and sin against his Heavenly Father’s 10 Commandments (committing adultery) because he could not afford to have companionship in a pre-determined long term romantic relationship with one woman on, before and after February 9, 2009 pursuant to the March 5, 2009 Document by and through the Tay Tay Terror Attack;

a. Forcing Tay to be potential bait for ‘cougars’<sup>168</sup>,

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<sup>168</sup> Women in their PRIME: independent, sexy and wildly successful. They enjoy men that are youthful, fit with the same zest for life. Cougars are classy, confident women that already possess many of the finer things in life -- but now want the young, hot guy to go with it. See [http://www.huffingtonpost.com/2010/05/14/cougar-life-dating-site-a\\_n\\_576300.html](http://www.huffingtonpost.com/2010/05/14/cougar-life-dating-site-a_n_576300.html)



- b. Forcing Tay to sale sexual services to Jane Doe's in exchange for money, other sexual acts, food and other resources.

527. Tay suffers from a damaged Name and Likeness in the State's public records, on the internet and through Search Engines pertaining to Tay's drug test, education and litigation cases, and in the community as a Hidden Slave in Poverty Prison, and a Dope Boy.

528. Defendants and or RICO Defendants conspired to defraud the United States, or any agency thereof, including but not limited to USDOA, USDOE, UDHHS, USDOJ, US Department of Defense, the U.S. Department of Veteran Affairs, U.S. Department of Treasury and or the Internal Revenue Service, the U.S. Department of Labor, the State of Florida and or any other agency thereof in the manner of acts derived from the March 5, 2009 Document within the herein *MSN Hotmail Scheme*, *NSA Scheme*, *the Education and Employment Scheme*, *The United States Private Tutoring Scheme*, *Food Stamp Scheme*, *Paralegal Scheme*, *Marijuana Scheme*, *Delayed Justice Scheme*, *Defamation Scheme* and the *Florida Illegal Gambling Scheme* [hereinafter, "Tay Tay Terror Attack"] for the purpose of trafficking Tay's data info, benefitting from his human capitol, his Exclusive Name and Likeness and contract agreements, defaming Tay's character and conspiring with the RICO Defendants through the Tay Tay Terror Attack to place or return Tay to poverty on, before and after February 9, 2009, wherefore the March 5, 2009 Document therefore in violation of 18 USC § 1341 ("Frauds and Swindles") devising or intending to devise the Tay Tay Terror Attack or artifice to defraud pursuant to the herein ¶¶ 120 - 393, pursuant to the herein K-20 Education Surveillance and or *Sunshine Connection* scheme and or *Employment Surveillance*, *Education Surveillance*, *Sports and Entertainment Surveillance*, *Food Stamp Surveillance*, *Money Bank Surveillance*, *Communication Surveillance*, *Restaurant*



*Surveillance, Religious Surveillance, Civil and Criminal Surveillance, Medical Surveillance and Travel Surveillance* and or any other surveillance in providing goods and services to Tay pursuant to Fl. Stat. 501.203(8), wherefore the School Board and the State to use Microsoft products through the Microsoft Licensing Agreement with Dell, SHI and GovConnection to deny Tay employment as a substitute teacher through USPS Certified Mail in which Tay received on March 5, 2009 based on a falsified drug test, fraudulent pretenses, prejudicial representations including the February 9, 209 dating on the March 5, 2009 Document which implies a employment hoax in violation of and pursuant to 18 USC § 1346 (“Scheme or Artifice to Defraud”) and § 1589(a)(b) by providing or obtaining the labor or services of Tay on, before and after February 9, 2009 by means of force, threats of force, physical restraint or threats of physical restraint to Tay pursuant to the Tay Tay Terror Attack and in violation of Fl. Stat. 112.0455, (see sections (7)(a) and (8)(m) and Fl. Stat. 440. 102), or another person and by means of abuse or threatened abuse of law or legal process pursuant to and in violation of Fl. Stat. 112.0455 and Fl. Stat. 440. 102 (see section (1)(n)(6)(o) and section (2)) and or by means of the *Education Employment Scheme* and the Tay Tay Terror Attack intended to cause Tay to believe that if he did not perform such labor or services, such as having the required education background, and having the required references, his drug test and or Florida Chain of Custody for employment as a substitute teacher at LabCorp on February 23, 2009 administered by Neil Dash; that Tay or another person shall suffer serious harm such as, Tay’s livelihood, while knowingly benefitting, financially and or by received anything of value such as education grants, corporate contracts and contributions, accolades and awards from participating in the Tay Tay Terror Attack which has engaged in the providing or obtaining of labor or services by means of education, employment and



entrepreneurship from Tay as a Exclusive Public Figure to give back education to the State's public schools, wherefore Defendants and or RICO Defendants knowingly recruited, harbored, transported, provided and or obtained by means of the Tay Tay Terror Attack, Tay for labor and or services in violation of 18 USC §§ 1581 (*"Peonage"*) to hold or return Tay to a condition of peonage, and or target Tay to potentially arrest Tay on Dope Boy charges pertaining to marijuana under Fl. Stat. 893. 135 on, before and after the March 5, 2009 Document from the School Board and RICO Defendants, wherefore knew Tay had the likeness of Nino Lyons<sup>169</sup> and targeted Tay's Exclusive Image and Likeness as they did Nino Lyons, through the March 5, 2009 Document and or the Tay Tay Terror Attack or a nefarious scheme to deny Tay employment as a substitute teacher based on a falsified drug test pertaining to marijuana so that Tay can be an alleged co-conspirator in an illegal "underground drug-operation"; a Florida - International Dope Boy<sup>170</sup> Drug Trafficking Ring to potentially arrest Tay for possession of marijuana, and or possession of marijuana with the intent to distribute, and or marijuana paraphernalia pursuant to FL. Stat. 893. 13, pursuant to 21 USC § 801<sup>171</sup>, place and or return Tay to peonage through slavery<sup>172</sup> and trafficking of

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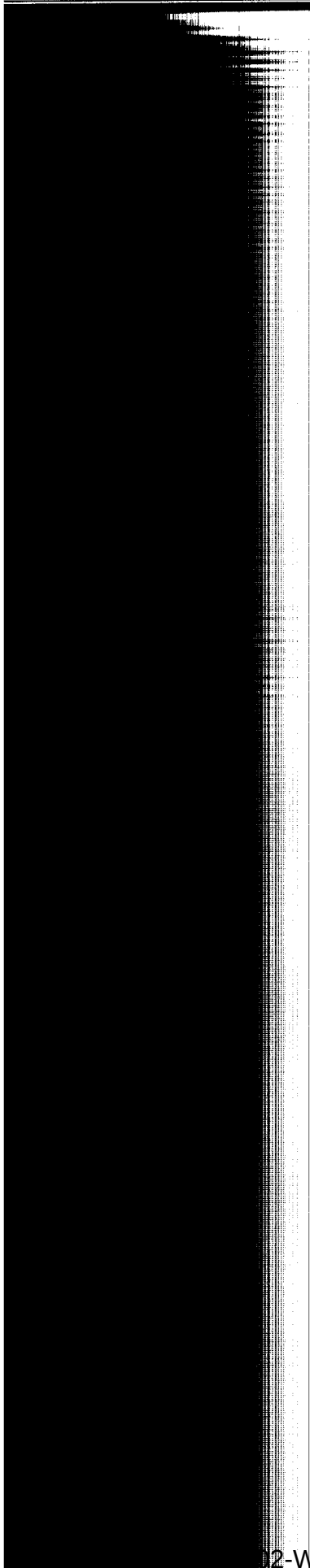
<sup>169</sup> "Nino Lyons" is a Cocoa businessman who spent three years in federal prison after a prosecutor hid and tampered with evidence. He grew up in the public housing projects of Cocoa, Fla.; while for several years his mother raised him alone. Even so, Lyons thrived: He graduated from college and worked briefly at the nearby Kennedy Space Center. In the 1990s, he opened clothing stores and nightclubs in Cocoa and Orlando who were wrongfully incarcerated in the Middle District of Florida – Orlando Division. See [http://usatoday30.usatoday.com/news/washington/judicial/2010-09-22-federal-prosecutors-reform\\_N.htm](http://usatoday30.usatoday.com/news/washington/judicial/2010-09-22-federal-prosecutors-reform_N.htm)

<sup>170</sup> "Dope Boy, Dope Boyz or Dope Boys" means any male who distributes illicit substances. Most often used to describe a young male that sells to a specific geographic area or neighborhood, and most likely moves hard drugs (ex. cocaine, crack), as well as the standard marijuana and prescription pills. Mostly used in the Southern part of the US, even though its use has become more widespread due to the emergence of southern Rap in the mainstream pursuant to FL. Stat. 893.13, 21 USC §§ 844, 863 (Drug Paraphernalia), and other laws pursuant to 21 USC § Part D (Offenses and Penalties) and in the particular case exclusively pursuant to 21 USC § 801 (Congressional Finding and Declarations: Controlled Substances).

<sup>171</sup> Subsection (1) entails; many of the drugs... have a useful and legitimate medical purpose and are necessary to maintain the health and general welfare of the American people. ("marijuana")

<sup>172</sup> The Door of No Return.





Tay's Exclusive Image and Likeness, Name and Likeness and Property through the underground Florida Pipeline slave trade in poverty, defame Tay's Exclusive Image and Likeness, Name and Likeness and Property, steal his money and convert his money for public and private use pursuant to 21 USC § 1524 ("Authorization of Appropriations")<sup>173</sup> wherefore Tay Tay Terror Attack and its RICO Defendants and co conspirators intentionally violated the Dodd Frank Wall Street Reform and Consumer Protection Act to scheme, coerce, induce, persuade, enslave, mislead and deceive Tay by and through the USPS Certified Mail, electronic mail, and other forms of communications, United States and or foreign currency and the stock market pursuant to the March 5, 2009 Document within the Tay Tay Terror Attack, with the intent of placing Tay to a condition of peonage pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack, §1584 ("*Sale Into involuntary servitude*") while knowingly and willfully holding Tay to involuntary servitude as unemployed and living below the poverty line on food stamps in a hostile environment, §1589 as mentioned herein, §1590 as mentioned herein, §1592 ("Unlawful conduct with respect to documents in furtherance of trafficking, peonage, slavery, involuntary servitude, or forced labor") therefore knowingly destroying, concealing, removing, confiscating, or possessing Tay's Data Info pursuant to his February 23, 2009 Florida Chain of Custody form pursuant to the March 5, 2009 Document or Tay Tay Terror Attack and employment hoax in the course of violation of sections 1581, 1584, 1589, 1590 and 1594 with intent to violate section 1581, 1584, 1589, 1590 and 1594 to prevent or restrict or to attempt to prevent or restrict, without lawful authority, Tay's liberty to move or travel, in order to maintain the labor or services of Tay being held against his will as a unemployed poverty participant

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<sup>173</sup> The United States appropriated funds to the Office of National Drug Control Policy. From 2003 – 2012, the Office of National Drug Control Policy has appropriated about \$485 million to enforce this chapter.



receiving food stamps, when Tay is a victim of a severe form of trafficking in persons, as defined in section 103 of the Trafficking Victims Protection Act of 2000, therefore Defendants and or RICO Defendants knowingly benefits, financially or by receiving anything of value, from participation in the Tay Tay Terror Attack which engaged in mail fraud to place and or return Tay to peonage which violates section 1581(a), 1592, or 1595(a), knowing or in reckless disregard of the fact that the venture has engaged in such violation pursuant to and in violation of 18 USC § 1593A therefore giving Tay mandatory remedy and jurisdiction of this Complaint pursuant to 18 USC § 1595(a), whereto Defendants and or RICO Defendants and Defendants Obama, Rick Scott, Arne Duncan as USDOE Secretary, and Pam Stewart as FDOE Commissioner, School Board, LabCorp as a medical facility, and Neil Dash as a Medical Review Officer and being public officers or other person authorized by any law of the United States to make or give a substitute teacher certificate or the March 5, 2009 Document, knowingly makes and delivers as true such a substitute teacher certificate or the March 5, 2009 Document containing any statement which they know to be false pursuant to and in violation 18 USC § 1018 (“Official Certificates or Writings”) having taken an oath before a competent tribunal, officer, or person in any case in which a law of the United States authorizes an oath to be administered, such as doing business in the State of Florida and providing a Equal Employment Opportunity, that they willfully and contrary to such oaths state or subscribes any material matter which he does not believe to be true or in any declaration, certificate, verification, or statement under penalty of perjury as permitted under 28 USC § 1746, willfully subscribes as true the March 5, 2009 Document which they did not believe to be true before and after February 9, 2009 has committed perjury pursuant to 18 USC § 1621 (“Perjury Generally”) to obtain any of the moneys, funds, credits, assets,





securities, or other property owned by, or under the custody of, a financial institution, by means of false or fraudulent pretenses, representations, or promises of doing legal business and or making legal transactions which were deposited into financial institutions unknown pursuant to the March 5, 2009 Document before and after February 9, 2009 in violation of 18 USC § 1344 (“Bank Fraud”), trafficking Tay’s urine through a 18 USC § 1346 “marijuana drug test” scheme and or Florida Chain of Custody form in violation of 18 USC § 1347 (“Health Care Fraud”) administered, tested and concluded by LabCorp, Neil Dash, the School Board and the FDOE to defraud Tay’s Florida Chain of Custody forms for a Drug Free Workplace pursuant to Fl. Stat. 112. 0455 and 440.102 to obtain, by means of false or fraudulent pretenses, representations, or promises, any of the money or property owned by, or under the custody or control of, Tay’s Florida Chain of Custody forms in connection with the delivery of or payment for health care benefits, items, or services, or for obtaining money or property from Tay by means of false and or fraudulent pretenses, representations, or promises, or to sell, dispose of, loan, exchange, alter, give away, distribute, supply, or furnish or procure for unlawful use any counterfeit or spurious article such as the March 5, 2009 Document and or the Tay Tay Terror Attack to be intimidated or held out to be such counterfeit or spurious article for the purpose of executing the Tay Tay Terror Attack on the property of USDOE funded State municipality education facilities and offices, and in the United States Post office in Brevard County any matter or thing such as the March 5, 2009 Document to be sent or delivered to Tay in the scheme of the Tay Tay Terror Attack, or takes and receives from therefrom the March 5, 2009 Document or caused the March 5, 2009 Document to be delivered by mail or such carrier according to the direction thereon, such as Tay, with intent to cause serious injury to the business of Tay (pursuant to his entrepreneur purpose as a



Florida CEO and or former Florida CEO for FOCUS Solutions Limited, Inc. under the Florida Business Corporation Act as defined in Fl. Stat. Ch. 607 [“ugh Florida Boss”]), tainted or rendered materially false or misleading his Florida Chain of Custody and Equal Employment Opportunity pursuant to the herein *Marijuana Discrimination Scheme* at ¶287 and or the Tay Tay Terror Attack which affected Tay receiving employment to invest in his entrepreneurship endeavors as “ugh Florida Boss” to make financial transactions through wires to financial institutions in the United States and in foreign countries and or adjacent islands as “ugh Florida Boss,” therefore affecting him to pay debts that would provide him “financial freedom” as “ugh Florida Boss” in which to obtain and acquire his Self Made American Dream which includes, Peace with His “Heavenly Father,” a distinguished and exclusive Name and Likeness from Cocoa, FL and alumnae of the School Board and FAMU, a lucrative and diversified business portfolio and a luxuriously – humble “*Lifestyle*,” which includes adequate living wherefore affecting interstate and foreign commerce pursuant to 18 USC § 1365(b) (“Tampering with Consumer Products”) by and through the March 5, 2009 Document pursuant to and in violation of 18 USC § 1349 (“Attempt and Conspiracy”) while attempts or conspired to commit mail fraud and illegal acts within the Tay Tay Terror Attack and or the March 5, 2009 Document, which **THEREFORE** led to the April Fools Order from United States District Court – Middle District of Florida – Orlando Division pursuant to and in violation of 20 USC § 1021(8)(12)(13) who were also negligent and breaching their duties of care of integrity pursuant to Tay’s Exclusive Image and Likeness, Name and Likeness and therefore caused him and them severe Name and Likeness Damages. Gregory Presnell had the duty to respect Tay’s character and provide him justice based upon the evidence and claims for relief although inartistically authored. United States breached those



duties by calling Tay “not qualified to teach in public schools”, “a vexatious litigator”, and denying him any and all relief pursuant to his claims against the RICO Defendants. The breaching of these duties caused Tay severe and extreme emotional pain and suffering.

529.    **WHEREAS** the Defendants and or RICO Defendants forced Tay into a scheme of opportunity and acted to unlawfully and unreasonably detain Tay against his will and consent by force, threat to secretly and or publicly<sup>174</sup> confine, imprison and harbor him on food stamps with no residual income to invest in his business endeavors as “ugh Florida Boss,” purchase vehicles to travel, a personal home for adequate living pursuant to the herein the Tay Tay Terror Attack on, before and after March 5, 2009 in violation of and pursuant to FL Stat. 787.02; 18 USC § 1346; and 18 USC § 1589(a)(4).

530.    Therefore, Defendants knowing that Tay’s property was involved in a financial transaction for employment as a substitute teacher with the School Board and or any other employment with any other employer, entrepreneurship, education and sports, and religion represents the proceeds of some form of unlawful activity, conducts or attempts to conduct such a financial transaction which in fact involves the proceeds of mail, wire, health care and bank fraud pursuant to 18 USC 1341, 1343, 1344, 1347 pursuant to the March 5, 2009 Document and the Tay Tay Terror Attack on, before and after February 9, 2009 with the intent to promote the carrying on of mail, wire, health care, food stamp and bank fraud pursuant to the March 5, 2009 Document and the Tay Tay Terror Attack on, before and after February 9, 2009 knowing that the transaction is designed in whole or in part to conceal and

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<sup>174</sup> Tay can be viewed as publicly confined to the residence as on his Florida Driver’s license and as documented on his application for employment as a substitute teacher with the School Board for the following reasons. First, because Tay is a public figure who are publicly unemployed, publicly a defamed character pursuant to his unemployment and public litigation history in regards to the March 5, 2009 Document. The public views that Tay has no car, has no personal home, has no job and from the looks of it “no future” as he fellowships as a suffering indigent Pro Se Plaintiff with the public in religious institutions, athletic and other community events.



or disguise the nature, the location, the source, the ownership, or the control of the proceeds of the mail, wire, health care and bank fraud on, before and after February 9, 2009. Pursuant to 18 USC § 1956 as defined in 31 USC § 5340(2).

531. Wherefore Defendants transported, transmitted, and or transferred, or attempts to transport, transmit, or transfer any coin or currency of the United States or of any other country, travelers' checks, personal checks, bank checks, and money orders, or investment securities or negotiable instruments, in bearer form or funds from a place in the United States to or through a place outside the United States and or to a place in the United States from or through a place outside the United States with the intent to promote the carrying on of mail, wire, health care, food stamp and bank fraud and or knowing that the coin or currency of the United States or of any other country, travelers' checks, personal checks, bank checks, and money orders, or investment securities or negotiable instruments, in bearer form or funds involved in the transportation, transmission or transfer represents the proceeds of some form of mail, wire, health care, food stamp and bank fraud and knowing that such transportation, transmission or transfer is designed in whole or in part to conceal or disguise the nature, the source, the ownership or the control of proceeds from the mail, wire, health care, food stamp and bank fraud pursuant to the March 5, 2009 Document and the Tay Tay Terror Attack on, before and after February 9, 2009.

532. Wherefore Defendants, with the intent to promote the carrying out of mail, wire, health care, food stamps and bank fraud pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack on, before and after February 9, 2009 to conceal and or disguise the nature, location, source, ownership or control of Tay's property believed to be proceeds of mail, wire, health care, food stamp and bank fraud pursuant to the March 5, 2009 Document



and or the Tay Tay Terror Attack conducted and or attempted to conduct a transaction which in any way or degree affects interstate or foreign commerce involving the movement of funds by wire or other means or involving one or more monetary instruments, or involving the transfer of title to any real property, vehicle, vessel, or aircraft, or a transaction involving the use of a financial institution which is engaged in, or the activities of which affect, interstate or foreign commerce pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack on, before and after February 9, 2009 involving Tay's property represented to be proceeds of mail, wire, health care, food stamp and bank fraud and or property such as, LabCorp to conduct or facilitate mail, wire, health care, food stamp and bank fraud pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack.

533. Therefore the Defendants and or RICO Defendants misleading and deceptive advertisements of Tay obtaining and acquiring his Self Made American Dream through Trust In God, education, hard work and perseverance, that education is the key to coming out of poverty and the key to success, and most importantly, Tay failing a drug test for employment as a substitute teacher with the School Board, and Tay not being qualified to teach in Florida's public schools by Federal judges (in violation of and pursuant to 18 USC § 1001(a)(1)(2) pursuant to the herein *Delayed Justice Scheme*) on and after the April 1, 2010, pursuant to the "April Fool's Order" which were published throughout the State and other states, wires including computers and internet compatible cellular phones and televisions, the internet including search engine sites, and were thereby placed into interstate commerce which injured, and is likely to continue to injure, Tay. The deceptive advertisements about Tay and the Defendants and or RICO Defendants advertisements about acquiring and obtaining his Self Made American Dream as stated above violates Section 43(a) of the



Lanham Act, codified at 15 U.S.C. § 1125(a), which prohibits Defendants and or RICO Defendants from using false, misleading, or disparaging representations of fact that misrepresent the nature, characteristics, or qualities of its [Defendants and or RICO Defendants] own or Tay's products, including but not limited to his produced urine within his February 23, 2009 Florida Chain of Custody form and his intellectual property which produces his Exclusive Name and Likeness which is a commodity product of Tay in which provides Tay the opportunities to earn money to acquire and obtain his Self Made American Dream "*Lifestyle.*" (wherefore Defendants and or RICO Defendants devised a marketing and advertising scheme and or intending to devise a marketing and advertising scheme within thereto the *MSN Hotmail Scheme, NSA Scheme, the Education and Employment Scheme, the United States Private Tutoring Scheme, Food Stamp Scheme, Paralegal Scheme, Marijuana Scheme, Delayed Justice Scheme, Defamation Scheme and the Florida Illegal Gambling Scheme* [hereinafter, "Tay Tay Terror Attack"] pursuant to the March 5, 2009 Document to defraud Tay, the United States and its agencies for obtaining his money and property on, before and after February 9, 2009 by means of false or fraudulent pretenses, representations, and or promises of a Equal Employment Opportunity and providing a safe and secure education in the State, transmitted and or caused to be transmitted by means of computers, cellular phones, radio, television communications in Defendants and or RICO Defendants television programming and marketing and advertising scheme in interstate and or foreign commerce, any writings, signs, signals, pictures or sounds for the purpose of executing the Tay Tay Terror Attack and benefitting from the March 5, 2009 Document and the Tay Tay Terror Attack pursuant to 18 USC § 1593A). As a result of the misleading and deceptive advertising, Tay suffers damages. Tay is entitled to relief pursuant to 15 USC § 1117.



534. Tay further alleges that according to Article IV § 1 Fla. Const., states that the education of children is a “fundamental value” in the State of Florida. This right to a uniform, efficient, safe, secure and high quality operation found in this article is the result of a 1998 amendment to the Florida Constitution enacted by the citizens of Florida to strengthen and define the right to a high quality education operation in the State. Tay further alleges that Article IV § 1 Fla. Const. further requires “the state to make adequate provisions for the education of all children.” Defendants and or RICO Defendants violated State Constitution pursuant to Title XLVII – K-20 Code Section; 1000.03 (5) (“Mission and Goals of K-20”); Section 1000.05 (“Discrimination Against Employees”) therefore the *Florida Educational Equity Act* because Tay is a black, African American, single male and under the age of 25 on and before February 9, 2009; Section 1001.40 (“School Board Constitutes a Corporation”); and Section 1012 (“Personnel”) Articles .01, .05, .07, .21, .22, .27(3), .31(4), .51, .53, .54, .55, .56, .58, .796, and .798.

535. Under 42 USC §1981, Tay has the right to make and enforce contracts as a substitute teacher applicant -- which includes the making, performance, modification, and termination of contracts, and the enjoyment of all benefits, privileges, terms, and conditions of the contractual relationship -- as is enjoyed by white people.

536. The Defendants and or RICO Defendants failed and refused to hire Tay, and unlawfully and deceptively discriminated against him and them by denying him employment as a substitute teacher based on a falsified drug test than similarly white citizens who were applying to become a substitute teacher with the School Board so that he could not enjoy the privileges, benefits, terms and conditions of a contractual relationship as a substitute teacher with the School Board as Tay was the only black male substitute applicant in the School



Board and State's substitute training on February 10, 2009 at the School Board but were subjected to Target Discrimination on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

537. Defendants and or RICO Defendants defrauded and attempted to defraud Tay's urine test inconclusively with a controlled substance such as, marijuana by the overt acts in his employment procedure pursuant to the herein Tay Tay Terror Attack within the Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to the March 5, 2009 Document pursuant to 18 USC § 1365 (Tampering with consumer products), 18 USC § 1518 (Obstruction of Criminal Investigations of health care officers), and 18 USC § 669 (Theft or embezzlement with health care), §1515(a)(3), Title 18 USC §§ 241 and 371.

538. Defendants and or RICO Defendants violated Title XLV – Medical Malpractice and Related Matters, Chapter 766 of the Florida [State] Constitution - Article .102 (“Medical Negligence”), .104 (“Pleading in Medical Negligence Cases”), .204 (“Availability of Medical Records... Investigation of medical negligence claims; penalty”). Tay are entitled to as codified in Fl. Stat. Chapter 768 – Negligence, .42 (“Damages”), .72 (“Pleadings in Civil Actions; Claim for Punitive Damages”) 2(a) Intentional Misconduct and 2(b) Gross Negligence, .725 (“Punitive Damages; burden of proof”), and .79 (“Offer of Judgment and Demand for judgment”) pursuant to the School Board's Offer of Judgment for \$50 to Tay in 2010 whereto the 2009 Sham Litigation.

539. Defendants and or RICO Defendants forced Tay into illegal marijuana use, possession or distribution<sup>175</sup> (“Dope Boy Trafficking”), exchanging food stamps (SNAP) benefits for cash for necessities pursuant to [Fl. Stat. 414.39] (Social Welfare Fraud) (Florida Department of Children and Families Benefits Recovery and ACCESS Integrity Policy 3610.0000 (ACCESS

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<sup>175</sup> See Florida Criminal Code 893, Florida Criminal Code § 775.082(a), Florida Criminal Code 322.271





Integrity) (“Food Stamp Trafficking”<sup>176</sup>) and illegal gambling in an illegal facility at and with Allied Veterans, working under the table tax free as a suffering “Hidden Slave” as codified in FL. Stat. 112.31901, downloading protected and or unprotected, free or illegally downloaded or copyrighted or unprotected music, movies and any other audio and video files and any and or all other wrongdoing knowingly and or unknowingly (“Pirating”<sup>177</sup>) within the Tay Tay

<sup>176</sup>Trafficking of food stamps occurs when a person who receives food stamps and or SNAP benefits, buys or sells his or her benefits for cash, or other unapproved items. See <http://www.fns.usda.gov/fraud/what-fns-doing-fight-snap-fraud>. The USDA’s definition of “Trafficking” is fraudulent and is a scheme to arrest, and or deprive Tay of his food stamps. The definition states “trafficking occurs when a person who receives food assistance, buys or sells his or her benefits for cash, or other unapproved items. If convicted of trafficking, depending on severity, you may also be fined up to \$250,000 or put in prison for up to 20 years, or both.” Tay cannot buy his own food stamp benefits because first, “he has no money” to buy anything, and secondly if Tay did have money to allegedly buy his own food stamps that would be defined as “possessing personal cash and private food stamps to purchase anything including food” as a consumer and SNAP benefit recipient. This definition can only be defined as “trafficking” if a person who receives food assistance sells his or her benefits to any person not receiving benefits or receiving food assistance for cash or any other unapproved item. The USDA, Chase, FDCF, Rick Scott and Barack Obama conspired with reckless disregard for the risk that Tay will be placed in danger of death or bodily injury such as, malnutrition from detrimental poverty living in a hostile living environment suffering from emotional distress, and or prison from alleged “trafficking” and under circumstances of the *Food Stamp Scheme* and or the Tay Tay Terror Attack manifesting extreme indifference to such risk, tampered with Tay’s food stamps and or “food stamp contract” which affected how to survives and what he purchases through machines and wires with his Chase food stamp debit card that can only purchase food not cooked or hot, therefore affecting interstate or foreign commerce, or the labeling of Tay’s food stamps or food stamp contract with intent to cause serious injury to the business of Tay, tainted his food stamps and or food stamp contract and or rendered materially false or misleading the labeling of, or container for Tay’s food stamps and or “food stamp contract” which therefore affects interstate or foreign commerce pursuant to 18 USC § 1365 (“Tampering With Consumer Products”) wherefore this herein referenced section is a violation of 18 USC § 1594(a)(b) therefore devising a “food stamp contract” scheme to defraud Tay and the United States or for obtaining money or property from Tay (“Tay’s livelihood”) and the United States by means of false or fraudulent pretenses, representations or promises by participating in racketeering acts and or acquiring and obtaining an interest in racketeering activity with the *Food Stamp Scheme* and or the Tay Tay Terror Attack knowingly executed with intent to deprive Tay his food stamps and or send Tay to prison, the “food stamp contract” scheme to defraud the United States and or obtain money or property by means of false or fraudulent pretenses, representations, or promises in Tay’s “food stamp contract” or in any procurement of property or services as a prime contractor with the United States or as a subcontractor or supplier on Tay’s “food stamp contract” in which there is a prime contract with the United States, including but not limited to farm subsidies, the Agricultural Act of 2014 for over \$1, 000, 000 therefore in violation of and pursuant to 18 USC § 1040 (“Fraud in connection with... emergency benefits”). See <http://www.fsa.usda.gov/FSA/webapp?area=about&subject=landing&topic=bap-bu-ap> . [hereinafter, the herein referenced are now pursuant to the herein “*Food Stamp Scheme*”]

<sup>177</sup> Is the copying and distributing of copies of a piece of music for which the composer, recording artist, or copyright-holding record company did not give consent.



Terror Attack as a result of the harm done to him by and through the March 5, 2009

Document and or within the Tay Tay Terror Attack.

540. Pursuant to *United States v. Sun Diamond Grower of California*, 138 F. 3d961 (D.C., 1998) "[t]here must be a failure to disclose something which in the knowledge or contemplation of the employee [co – conspirator non Defendants, Defendants and RICO Defendants] poses an independent business risk to the employer [Tay]..." with an intent to defraud Tay with intent to cause economic harm to Tay on, before and after February 9, 2009.

541. Whether the risk materializes or not is irrelevant; the point is that the [Defendants and RICO Defendants] has no right to endanger the [Tay's] financial health or jeopardize the [Tay's] long-term prospects through self-dealing. Therefore, so long as the [Defendants and RICO Defendants] could have reasonably foreseen the risk to which he was exposing [Tay], the requirements of § 1346 ... have been met. See *United States v. Vinyard*, 266 F.3d 320 (4th Cir. 2001).

542. As a result of the harm done to Tay, he suffers damages. Tay is entitled to relief pursuant to 42 USC § 1983.

## **COUNT 2 – SCHEME TO DEFRAUD**

### **Pursuant to 18 USC § 1346**

543. Pursuant to the herein *MSN Hotmail Scheme*; the Web Partner Program devised a scheme or artifice in violation of mail, wire, bank, health care and food stamp fraud on, before and after February 9, 2009 pursuant to the March 5, 2009 Document to defraud and deprive Tay the intangible right of obtaining and acquiring his Self Made American Dream through the honest services of the Web Partner Program and Tay's email and data information protection in coercing Tay to sign up and obtain a hotmail account or accounts, to house and harbor



Tay's Data Info while advertising secure email account protection and benefitting from sponsors and or ads and or contract agreements pursuant to the *MSN Hotmail Scheme* in exchange for Tay's Data Info and used Microsoft's email system on the internet to transmit and or caused to be transmitted to Tay the fraudulent pretenses, representations and promises of reclaiming his MSN Hotmail account and or Hotmail account(s) from the herein *MSN Hotmail Scheme*.

544. Pursuant to *United States v. Sun Diamond Grower of California*, 138 F. 3d961 (D.C., 1998) "[t]here must be a failure to disclose something which in the knowledge or contemplation of the employee [co – conspirator non Defendants, Defendants and RICO Defendants] poses an independent business risk to the employer [Tay]..." with an intent to defraud Tay with intent to cause economic harm to Tay on, before and after February 9, 2009.

545. Defendants knowing that Tay's email addresses involved in a financial transaction for and or in exchange for Tay's Data Info which represents the proceeds of some form of unlawful activity, conducts or attempts to conduct such a financial transaction which in fact involves the proceeds of mail, wire, health care and bank fraud pursuant to 18 USC 1341, 1343, 1344, 1347 pursuant to the March 5, 2009 Document and the Tay Tay Terror Attack on, before and after February 9, 2009 with the intent to promote the carrying on of mail, wire and bank fraud pursuant to the March 5, 2009 Document and the Tay Tay Terror Attack on, before and after February 9, 2009 knowing that the transaction is designed in whole or in part to conceal and or disguise the nature, the location, the source, the ownership, or the control of the proceeds of the mail, wire, health care and bank fraud on, before and after February 9, 2009. Pursuant to 18 USC § 1956 as defined in 31 USC § 5340(2).



546. Defendants and or RICO Defendants transported, transmitted, and or transferred, or attempts to transport, transmit, or transfer any coin or currency of the United States or of any other country, travelers' checks, personal checks, bank checks, and money orders, or investment securities or negotiable instruments on, before and after February 9, 2009 pursuant to the March 5, 2009 Document, in bearer form or funds from a place in the United States to or through a place outside the United States and or to a place in the United States from or through a place outside the United States with the intent to promote the carrying on of mail, wire, health care, food stamp and bank fraud on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or knowing that the coin or currency of the United States or of any other country, travelers' checks, personal checks, bank checks, and money orders, or investment securities or negotiable instruments, in bearer form or funds involved in the transportation, transmission or transfer represents the proceeds of some form of mail, wire, health care, food stamp and bank fraud and knowing that such transportation, transmission or transfer is designed in whole or in part to conceal or disguise the nature, the source, the ownership or the control of proceeds from the mail, wire, health care, food stamp and bank fraud pursuant to the March 5, 2009 Document and the Tay Tay Terror Attack on, before and after February 9, 2009.

547. Defendants and or RICO Defendants, with the intent to promote the carrying out of mail, wire, health care, food stamp and bank fraud pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack on, before and after February 9, 2009 to conceal and or disguise the nature, location, source, ownership or control of Tay's property believed to be proceeds of mail, wire, health care, food stamp and bank fraud pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack conducted and or attempted to conduct a



transaction which in any way or degree affects interstate or foreign commerce involving the movement of funds by wire or other means or involving one or more monetary instruments, or involving the transfer of title to any real property, vehicle, vessel, or aircraft, or a transaction involving the use of a financial institution which is engaged in, or the activities of which affect, interstate or foreign commerce pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack on, before and after February 9, 2009 involving Tay's property represented to be proceeds of mail, wire, health care and bank fraud and or property such as, LabCorp to conduct or facilitate mail, wire, health care and bank fraud pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack.

548. Whether the risk materializes or not is irrelevant; the point is that the [Defendants and RICO Defendants] has no right to endanger the [Tay's] financial health or jeopardize the [Tay's] long-term prospects through self-dealing. Therefore, so long as the [Defendants and RICO Defendants] could have reasonably foreseen the risk to which he was exposing [Tay], the requirements of § 1346 ... have been met. See *United States v. Vinyard*, 266 F.3d 320 (4th Cir. 2001).

### **COUNT 3 – SCHEME TO DEFRAUD**

#### **Pursuant to 18 USC § 1346**

549. Pursuant to the herein *MSN Hotmail Scheme*; Defendants and or RICO Defendants devised a scheme or artifice in violation of mail, wire, health care, food stamp and bank fraud pursuant to 18 USC § Chapter 63 to defraud and deprive Tay the intangible right of obtaining and acquiring his Self Made American Dream pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack through the dishonest services of the Web Partner Program and Tay's email protection and data information protection in coercing Tay to sign up and obtain



a hotmail account, to house and harbor Tay's Data Info while advertising secure email account protection for monetary gain and other benefits from sponsors and or ads and or contract agreements with other co – conspirator non – Defendants, Defendants and RICO Defendants, including companies and or individuals in foreign countries in exchange for Tay's Data Info on, before and after February 9, 2009 pursuant to the March 5, 2009 Document o.

#### **COUNT 4 – SCHEME TO DEFRAUD**

##### **Pursuant to 18 USC § 1346**

550. Pursuant to the herein *NSA Scheme*; the NSA, co – conspirator non Defendants, Defendants and or RICO Defendants devised a “data collection” scheme in violation of mail, wire, health care, food stamp and bank fraud pursuant to 18 USC § Chapter 63 to artifice, defraud and deprive Tay the intangible right of honest services of data collection to illegally retrieve and store Tay's Data Info from other co – conspirator non Defendants, Defendants and or RICO Defendants for informational gain to target Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack to place and or return Tay to poverty; using data collection tactics to track and trace Tay's movements, conversations, communications, and other data by and through devices and or programs such as XKeyscore, PRISM, FISA's roving surveillance, internet scheme by and through the herein; *Employment Surveillance, Education Surveillance, The United States Private Tutoring Scheme, Sports and Entertainment Surveillance, Food Stamp Surveillance, Money Bank Surveillance, Communication Surveillance, Restaurant Surveillance, Religious Surveillance, Civil and Criminal Surveillance, Medical Surveillance and Travel Surveillance* as a fraudulent pretenses, representations and promises of consumer product safety pursuant



to Fl. Stat. 501.203(8) on, before and after February 9, 2009 pursuant to the March 5, 2009 Document;

**COUNT 5 - SCHEME TO DEFRAUD**

**Pursuant to 18 USC § 1346**

551. Pursuant to Tay being denied education at Everest University due to a debt at Florida A&M University, the USDOE devised a financial aid scheme in violation of mail, wire, health care, food stamp and bank fraud pursuant to 18 USC § Chapter 63 to deprive Tay of the intangible rights of honest services pursuant to receiving financial aid in order to attend Everest as a Paralegal major using the electronic mail service to transmit the USDOE financial aid fraud disclosing Tay's financial aid award to attend Everest as a Paralegal major with an intent to defraud Tay with intent to cause economic harm to Tay pursuant to the March 5, 2009 Document on, before and after February 9, 2009. Tay suffers economic harm such as Tay's livelihood.

**COUNT 6 - SCHEME TO DEFRAUD**

**Pursuant to 18 USC § 1346**

552. Pursuant to the herein *Food Stamp Scheme*, Defendants devised the *Food Stamp Scheme* in violation of mail, wire, health care, food stamp and bank fraud pursuant to 18 USC § Chapter 63 to defraud and deprive Tay the intangible right of honest services as a food stamp recipient receiving said amount of benefits using the USPS mailing system and electronic mail to transmit the Food Stamp Scheme to Tay with an intent to defraud Tay with intent to cause economic harm to Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

**COUNT 7 - SCHEME TO DEFRAUD**



**Pursuant to 18 USC § 1346**

553. Pursuant to the herein *Marijuana Discrimination Scheme*, Defendants devised the *Marijuana Discrimination Scheme* to defraud and deprive Tay in violation of mail, wire, health care, food stamp and bank fraud pursuant to 18 USC § Chapter 63 the intangible right of honest services as a substitute teacher applicant with the School Board pursuant to the March 5, 2009 Document and the Tay Tay Terror Attack with an intent to defraud Tay with intent to cause economic harm to Tay on, before and after February 9, 2009.

**COUNT 8 - SCHEME TO DEFRAUD**

**Pursuant to 18 USC § 1346**

554. Pursuant to the herein *The United States Private Tutoring Scheme*, Defendants devised the *The United States Private Tutoring Scheme* in violation of mail, wire, health care, food stamp and bank fraud pursuant to 18 USC § Chapter 63 to defraud and deprive Tay the of the intangible right of honest services educating children, educating children from low income households, educating children from low income households for benefit and or profit as a private contractor for ADC using electronic mail and cellular phones to transmit the scheme with an intent to defraud Tay and with intent to cause economic harm to Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

**COUNT 9 – SCHEME TO DEFRAUD**

**Pursuant to 18 USC § 1346**

555. Pursuant to the herein *Education and Employment Scheme*; co – conspirator non Defendants, Defendants and or RICO Defendants devised a State K – 20 education curriculum scheme in violation of mail, wire, health care, food stamp and bank fraud pursuant to 18 USC § Chapter 63 to defraud and deprive Tay his intangible rights in the





the March 5, 2009 Document and or the Tay Tay Terror Attack wherefore Tay was lured by the State's marketing and advertising of the Power Ball and other State lottery gaming between single, double and triple digit million dollar winnings. Tay played scratch off's, Lotto, Cash 3, Fantasy 5 and Power Ball in attempt to escape poverty to obtain and acquire his Self Made American Dream. The Tay Tay Terror Attack to defraud was with an intent to defraud Tay with intent to cause economic harm to Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack.

**COUNT 11 – SCHEME TO DEFRAUD**

**Pursuant to 18 USC § 1346**

557. Defendants and or RICO Defendants devised the March 5, 2009 Document and or Tay Tay Terror Attack scheme in violation of mail, wire, health care, food stamp and bank fraud pursuant to 18 USC § Chapter 63 to defraud and deprive Tay the intellectual rights of receiving a equal Employment Opportunity and obtaining his Self Made American Dream on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack, the Defendants and or RICO Defendants used Microsoft products through the Sunshine Connection scheme, the electronic mail and USPS Certified Mail to transmit or cause to be transmitted the March 5, 2009 Document and or the Tay Tay Terror Attack in the trafficking of Tay's data info, benefitting from his human capitol and contract agreements, and conspiring with the Defendants and or RICO Defendants to place or return Tay to poverty on, before and after February 9, 2009, wherefore the March 5, 2009 Document therefore in violation of 18 USC § 1341 ("Frauds and Swindles") devising or intending to devise the Tay Tay Terror Attack or artifice to defraud pursuant to the herein ¶¶ 120 - 393, pursuant to the herein Tay Tay Terror Attack, K-20 Education Surveillance and or *Sunshine*



*Connection* scheme and or *Employment Surveillance*, *Education Surveillance*, *The United States Private Tutoring Scheme*, *Sports and Entertainment Surveillance*, *Food Stamp Surveillance*, *Money Bank Surveillance*, *Communication Surveillance*, *Restaurant Surveillance*, *Religious Surveillance*, *Civil and Criminal Surveillance*, *Medical Surveillance* and *Travel Surveillance* in providing goods and services to Tay pursuant to Fl. Stat.

501.203(8) (wherefore Defendants and or RICO Defendants devised a marketing and advertising scheme and or intending to devise a marketing and advertising scheme within thereto the *MSN Hotmail Scheme*, *NSA Scheme*, *the Education and Employment Scheme*, *The United States Private Tutoring Scheme*, *Food Stamp Scheme*, *Paralegal Scheme*, *Marijuana Scheme*, *Delayed Justice Scheme*, *Defamation Scheme* and *the Florida Illegal Gambling Scheme* [hereinafter, “Tay Tay Terror Attack”] pursuant to the March 5, 2009 Document) and or any other surveillance, wherefore the School Board and the State used Microsoft products through the Sunshine Connection scheme and Microsoft Licensing Agreement with Dell, SHI and GovConnection to deny Tay employment as a substitute teacher through USPS Certified Mail on March 5, 2009 based on a falsified drug test and prejudicial dating on the March 5, 2009 Document which implies a employment hoax in violation of and pursuant to 18 USC § 1346 (“Scheme or Artifice to Defraud”) and § 1589(a)(b) by providing or obtaining the labor or services of Tay by means of force, threats of force, physical restraint or threats of physical restraint to Tay pursuant to and in violation of Fl. Stat. 112.0455, see sections (7)(a) and (8)(m) and Fl. Stat. 440. 102, or another person and by means of abuse or threatened abuse of law or legal process pursuant to and in violation of Fl. Stat. 112.0455 and Fl. Stat. 440. 102 (see section (1)(n)(6)(o) and section (2)) and or by means of the *Education Employment Scheme* and the Tay Tay Terror Attack intended to cause Tay to believe that if



he did not perform such labor or services, such as his drug test and or Florida Chain of Custody for employment as a substitute teacher at LabCorp on February 23, 2009 administered by Neil Dash; that Tay or another person shall suffer serious harm such as Tay's livelihood while knowingly benefitting, financially and or by received anything of value such as education grants, corporate contracts and contributions, and awards from participating in the Tay Tay Terror Attack which has engaged in the providing or obtaining of labor or services by means of education, employment and entrepreneurship as a Exclusive Public Figure to give back education in the State's public schools, wherefore knowingly recruited, harbored, transported, provided and or obtained by means of the Tay Tay Terror Attack, Tay for labor and or services in violation of 18 USC §§ 1581 ("*Peonage*") to hold or return Tay to a condition of peonage, and or target Tay to potentially arrest Tay pertaining to marijuana under Fl. Stat. 893. 135 with the intent of placing Tay to a condition of peonage pursuant to the March 5, 2009 Document, §1584 ("*Sale Into involuntary servitude*") while knowingly and willfully holding Tay to involuntary servitude as unemployed and living below the poverty line on food stamps in a hostile environment, §1589 as mentioned herein, §1590 as mentioned herein, §1592 ("Unlawful conduct with respect to documents in furtherance of trafficking, peonage, slavery, involuntary servitude, or forced labor") therefore knowingly destroying, concealing, removing, confiscating, or possessing Tay's Data Info pursuant to his February 23, 2009 Florida Chain of Custody form pursuant to the March 5, 2009 Document and employment hoax in the course of violation of sections 1581, 1584, 1589, 1590 and 1594 with intent to violate section 1581, 1584, 1589, 1590 and 1594 to prevent or restrict or to attempt to prevent or restrict, without lawful authority, Tay's liberty to move or travel, in order to maintain the labor or services of Tay as a unemployed poverty



participant receiving food stamps, when Tay is a victim of a severe form of trafficking in persons, as defined in section 103 of the Trafficking Victims Protection Act of 2000, therefore knowingly benefits, financially or by receiving anything of value, from participation in the Tay Tay Terror Attack which engaged in mail fraud to place and or return Tay to peonage which violates section 1581(a), 1592, or 1595(a), knowing or in reckless disregard of the fact that the venture has engaged in such violation pursuant to and in violation of 18 USC § 1593A therefore giving Tay mandatory remedy and jurisdiction of this Complaint pursuant to 18 USC § 1595(a), whereto RICO Defendants and Defendants School Board Deputy Superintendent, LabCorp as a medical facility, and Neil Dash as a Medical Review Officer and being public officers or other person authorized by any law of the United States to make or give a substitute teacher certificate or the March 5, 2009 Document, knowingly makes and delivers as true such a substitute teacher certificate or the March 5, 2009 Document containing any statement which they know to be false pursuant to and in violation 18 USC § 1018 (“Official Certificates or Writings”) having taken an oath before a competent tribunal, officer, or person in any case in which a law of the United States authorizes an oath to be administered, such as doing business in the State of Florida and providing a Equal Employment Opportunity, that they willfully and contrary to such oaths state or subscribes any material matter which he does not believe to be true or in any declaration, certificate, verification, or statement under penalty of perjury as permitted under 28 USC § 1746, willfully subscribes as true the March 5, 2009 Document which they did not believe to be true before and after February 9, 2009 has committed perjury pursuant to 18 USC § 1621 (“Perjury Generally”) to obtain any of the moneys, funds, credits, assets, securities, or other property owned by, or under the custody of, a financial institution, by



means of false or fraudulent pretenses, representations, or promises of doing legal business and or making legal transactions which were deposited into financial institutions unknown pursuant to the March 5, 2009 Document before and after February 9, 2009 in violation of 18 USC § 1344 (“Bank Fraud”), trafficking Tay’s urine through a 18 USC § 1346 “marijuana drug test” scheme in violation of 18 USC § 1347 (“Health Care Fraud”) administered, tested and concluded by LabCorp, Neil Dash, the School Board, USDHHS and the FDOE to defraud Tay’s Florida Chain of Custody forms for a Drug Free Workplace pursuant to Fl. Stat. 112. 0455 and 440.102 to obtain, by means of false or fraudulent pretenses, representations, or promises, any of the money or property owned by, or under the custody or control of, Tay’s Florida Chain of Custody forms in connection with the delivery of or payment for health care benefits, items, or services, or for obtaining money or property from Tay by means of false and or fraudulent pretenses, representations, or promises, or to sell, dispose of, loan, exchange, alter, give away, distribute, supply, or furnish or procure for unlawful use any counterfeit or spurious article such as the March 5, 2009 Document and or the Tay Tay Terror Attack to be intimidated or held out to be such counterfeit or spurious article for the purpose of executing the Tay Tay Terror Attack on the property of USDOE funded State municipality education facilities and offices, and in the United States Post office in Brevard County any matter or thing such as the March 5, 2009 Document to be sent or delivered to Tay in the scheme of the Tay Tay Terror Attack, or takes and receives from therefrom the March 5, 2009 Document or caused the March 5, 2009 Document to be delivered by mail or such carrier according to the direction thereon, such as Tay, with intent to cause serious injury to the business of Tay, tainted or rendered materially false or misleading his Florida Chain of Custody and Equal Employment Opportunity pursuant to the



herein *Marijuana Discrimination Scheme* at ¶287 which affected Tay receiving employment to invest in his entrepreneurship endeavors to make financial transactions through wires to financial institutions in the United States and in foreign countries and or adjacent islands, therefore affecting him to pay debts that would provide him “financial freedom” in which to obtain and acquire his Self Made American Dream which includes, Peace with His “Heavenly Father”, a distinguished and exclusive Name and Likeness from Cocoa, FL and alumnae of the School Board and FAMU, a diversified business portfolio and a luxuriously – humble “*Lifestyle*,” which includes adequate living wherefore affecting interstate and foreign commerce pursuant to 18 USC § 1365(b) (“Tampering with Consumer Products”) by and through the March 5, 2009 Document pursuant to and in violation of 18 USC § 1349 (“Attempt and Conspiracy”) while attempts or conspired to commit mail fraud and illegal acts within *Florida’s Illegal Gambling Scheme* in violation of 31 USC § 5362(10) (the State and Allied Veterans of the World and Affiliates and co – conspirators and or RICO Defendants pursuant to the herein “Operation Reveal the Deal” placed, received, or otherwise knowingly transmitted a bet or wager including but not limited to the staking or risking by Tay of something of value upon the outcome of a contest of others, or a game subject to chance pursuant to the herein “Operation Reveal the Deal” within *Florida’s Illegal Gambling Scheme* upon an agreement or understanding that Tay is not gambling and will receive money and or internet time in the event of a certain outcome such as swiping his card into Defendants devices to participate in “Operation Reveal the Deal” to get out of poverty by means of the Tay Tay Terror Attack which involves the use, at least in part, of the Internet where such bet or wager is unlawful under any applicable Federal or State law in the State or Tribal lands in which the bet or wager is initiated, received, or otherwise made with Rick



Scott as the Mastermind willingly and knowingly received donations from an illegal gambling enterprise for the purpose of becoming elected Governor of the State of Florida, having exclusive personal relationships for personal gain, including but not limited to former State Lt. Governor Jennifer Carroll, for private gain and exclusive relationships with Allied Veterans and it's co-conspirators in the herein illegal gambling scheme, herein the Complaint, to effect the object of the conspiracy to operate a nefarious scheme to place and or return Tay to poverty and or having reckless disregard for the risk of Tay being placed in danger of death or bodily injury and under circumstances manifesting extreme indifference to such risk, such as Tay's *Hostile Living Environment*: including but not limited to being shot and killed in a hostile living environment; or having obtained viruses and or diseases; or and or becoming a baby-daddy with multiple kids and baby mommas scheming off of United States government benefits such as food stamps, welfare and Medicaid; and or becoming harassed by police for being a black male in a poor neighborhood ("targeting Tay") as a exclusive public figure; and or for Tay to go insane and say "fuck it" and attempts to severely harm himself and or severely harm others pursuant to the harm done to him in which he suffers pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack with an intent to defraud Tay with intent to cause economic harm to Tay on, before and after February 9, 2009.

**COUNT 12 - CONSPIRACY TO VIOLATE RICO  
IN VIOLATION OF 18 USC § 1589(a)(4), RICO 18 USC § 1962(d)**

[All Defendants and or RICO Defendants, excluding any and or all agencies of the United States, or any officer or employee of the United States or any agency thereof acting within his or her official capacity or under color of legal authority; or a foreign state, an agency of a



foreign state, or an officer or employee of a foreign state or an agency thereof acting within his or her official capacity or under color of legal authority]

558. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits.

559. It shall be unlawful for any persons employed by or associated with any enterprise engaged in, or the activities of which affect, interstate or foreign commerce, to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity or collection of unlawful debt.

560. Defendants and or RICO Defendants form specified relationships between and amongst each other, and the Enterprise invested proceeds of the pattern of racketeering activity into the *MSN Hotmail Scheme, NSA Scheme, the Education and Employment Scheme, The United States Private Tutoring Scheme, Food Stamp Scheme, Paralegal Scheme, Marijuana Scheme, Delayed Justice Scheme, Defamation Scheme and the Florida Illegal Gambling Scheme* [hereinafter, "Tay Tay Terror Attack"] enterprise, or Defendants and or RICO Defendants acquired or manufactured interest in the *MSN Hotmail Scheme, NSA Scheme, the Education and Employment Scheme, The United States Private Tutoring Scheme, Food Stamp Scheme, Paralegal Scheme, Marijuana Scheme, Delayed Justice Scheme, Defamation Scheme and the Florida Illegal Gambling Scheme* [hereinafter, "Tay Tay Terror Attack"], or control over the *MSN Hotmail Scheme, NSA Scheme, the Education and Employment Scheme, The United States Private Tutoring Scheme, Food Stamp Scheme, Paralegal Scheme, Marijuana Scheme,*





*Delayed Justice Scheme, Defamation Scheme and the Florida Illegal Gambling Scheme*

[hereinafter, "Tay Tay Terror Attack"] enterprise through racketeering activity pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack, or Defendants and or RICO Defendants conducted or participated in the affairs of the *MSN Hotmail Scheme, NSA Scheme, the Education and Employment Scheme, The United States Private Tutoring Scheme, Food Stamp Scheme, Paralegal Scheme, Marijuana Scheme, Delayed Justice Scheme, Defamation Scheme and the Florida Illegal Gambling Scheme* [hereinafter, "Tay Tay Terror Attack"] enterprise through the pattern of racketeering activity pursuant to the March 5, 2009 Document and the Tay Tay Terror Attack, or Defendants and or RICO Defendants conspired to do one or more of the above herein mentioned.

561. Acquisition. Under § 1962(b), it is unlawful to acquire or maintain any interest in, or control of, any enterprise through a pattern of racketeering activity.
562. Participation. Under § 1962(c), it is unlawful for any person to conduct or participate in the conduct of the affairs of an enterprise through a pattern of racketeering activity.
563. Conspiracy. Under § 1962(d), it is "unlawful for any person to conspire to violate any of the provisions of" § 1962(a)(c).
564. At various times and places partially enumerated in Tay's *documentary material* pursuant to the March 5, 2009 Document and his Data Info, Defendants and or RICO Defendants did conspire to acquire and maintain an interest in a RICO *enterprise* [Tay Tay Terror Attack] which engaged in a *pattern of racketeering activity*, in violation of 18 U.S.C. §§ 1962(b) and (d). See also 18 U.S.C. §§ 1961(4), (5) and (9).
565. A large body of law has grown up around each of these subsections. This column focuses on standing to sue for civil RICO conspiracy, under § 1962(d).



566. The Defendants and or RICO Defendants form an enterprise under the RICO Act within the meaning of 18 U.S.C. § 1961 and engage in, or the activities of which affect, interstate or foreign commerce. The fraudulent representations described above were made by the Defendants and or RICO Defendants to Tay. Tay has standing to bring a RICO claim for relief.
567. The fraudulent representations set forth above represented a scheme and artifice to defraud Tay and the public, which was facilitated by use of the Defendants marketing and advertising of brands, Defendants devices and Defendants weapons of mass destruction; United States mail, email, telephones and online websites, and caused by the Defendants, and resulting in mail and wire fraud scheme to deprive Tay the intangible right of honest services within the meaning of 18 U.S.C. § 1341, 1343, 1346, 1347 and 1349 on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and Tay Tay Terror Attack.
568. On, before and after March 5, 2009 Defendants and or RICO Defendants did cooperate jointly and severally in the commission of two (2) or more of the predicate acts that are itemized at 18 U.S.C. §§ 1961(1)(A) and (B), in violation of 18 U.S.C. 1962(d). Pursuant to 84 Stat. 947, Sec. 904, Oct. 15, 1970, the RICO laws itemized above is to be *liberally* construed by this honorable Court. Said construction rule was never codified in Title 18 of the United States Code, however. *Respondeat superior*. The Doctrine of *Respondeat Superior* has been used in determining a medical provider's negligence.
569. The Defendants and or RICO Defendants engaged in and affected interstate commerce by fraudulently marketing and distributing its products in interstate commerce by and through the *MSN Hotmail Scheme, NSA Scheme, the Education and Employment Scheme,*



*The United States Private Tutoring Scheme, Food Stamp Scheme, Paralegal Scheme, Marijuana Scheme, Delayed Justice Scheme, Defamation Scheme and the Florida Illegal Gambling Scheme* [hereinafter, “Tay Tay Terror Attack”] on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

570. The Defendants and or RICO Defendants operate and manage the racketeering activity of mail and wire fraud because the Defendants and or RICO Defendants published false advertisements conceived by the Defendants for the purpose of driving Defendants profits by falsely representing to Tay that his access has been retrieved and verified, and that he could login to retrieve his property, and used the email to orchestrate this activity and to execute the fraud pursuant to the Tay Tay Terror Attack.

571. Under the RICO Act, wire fraud is defined by 18 U.S.C. § 1343, which states in pertinent part:

“Whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of fraud or fraudulent pretenses, representations, or promises, transmits or causes to be transmitted by means of wire, radio, or television communication in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme or artifice...”

572. The Defendants and or RICO Defendants operate and manage the racketeering of wire fraud because it publishes and transmits fraudulent advertisements and representations using the radio, television, cellular phones and internet to orchestrate the fraud by luring Tay to register, sign up and or apply for allegedly protected consumer services and or American Dream Contracts on and before February 9, 2009, knowing that they will breach their duties of care and fraudulently misrepresent Tay’s Name and Likeness and his Data Info for the sole purpose of generating profits to have Tay obtain other services.



573. Under the RICO Act, mail fraud is defined by 18 U.S.C. § 1341, which states in pertinent part:

“Whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of fraud or fraudulent pretenses, representations, or promises...for the purpose of executing such scheme or artifice...places in any post office or authorized depository for mail matter, any matter or thing whatever to be sent or delivered by the Postal Service, or...to be sent or delivered by any private or commercial interstate carrier, or takes or receives therefrom, any such matter or thing...”

574. Defendants and or RICO Defendants also use Tay’s Name and Likeness and his livelihood to make profit through internet and other services. By knowingly breaching their duties, the Defendants and or RICO Defendants targeted Tay for his information to become compromised so that they can make profit off of Tay’s Name and Likeness pursuant to the March 5, 2009 Document pursuant to the *MSN Hotmail Scheme, NSA Scheme, the Education and Employment Scheme, v, Food Stamp Scheme, Paralegal Scheme, Marijuana Scheme, Delayed Justice Scheme, Defamation Scheme and the Florida Illegal Gambling Scheme* [hereinafter, “Tay Tay Terror Attack”].

575. These racketeering practices constitute a pattern under the RICO Act since they are the normal business practices of the Defendants fraudulent activities on, before and after March 5, 2009 pursuant to the *MSN Hotmail Scheme, NSA Scheme, the Education and Employment Scheme, The United States Private Tutoring Scheme, Food Stamp Scheme, Paralegal Scheme, Marijuana Scheme, Delayed Justice Scheme, Defamation Scheme and the Florida Illegal Gambling Scheme* [hereinafter, “Tay Tay Terror Attack”].

576. Tay is a “person” with standing to sue within the meaning of 18 U.S.C. § 1964(c).

577. Each of the Defendants is a “RICO person” within the meaning of 18 U.S.C. § 1963(1).

578. It shall be unlawful for any persons employed by or associated with any enterprise engaged in, or the activities of which affect, interstate or foreign commerce, to conduct or



participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity or collection of unlawful debt.

579. Pursuant to the herein March 5, 2009 Document within the Tay Tay Terror Attack all Defendants constitute an association-in-fact, and therefore is an enterprise within the meaning of 18 U.S.C. § 1964(4).

580. Tay is falsely imprisoned in “Prison Poverty” by the Defendants pursuant to FL. Stat. § 787.02 and 18 USC § 1589(a)(4).

581. Tay suffered injuries as a result of the Defendants and or RICO Defendants actions are including but not limited to physical suffering, mental suffering and humiliation, loss of time and interruption of business, reasonable and necessary expenses incurred, and injury to reputation. The damages award may include compensation for loss of earnings while imprisoned, for bodily and mental suffering caused by the imprisonment, and for expenses incurred in securing discharge from restraint including a reasonable attorney fee.

582. The liability of a principal for the act of an employer in causing a false imprisonment depends upon whether the principal previously authorized the act, or subsequently ratified it, or whether the act was within the scope of the employee’s employment. *Bahakel v. Tate*, 503 So. 2d 837 (Ala. 1987).

583. Defendants and or RICO Defendants along with Defendants and non-defendants, conspired, agreed, planned and coordinated for the purpose of depriving Tay of equal protection of his rights under the Thirteenth Amendment to the United States Constitution and its implementing and enforcing statutes (inter alia, 18 U.S.C. §§ 1589, 1590) to be free from forced labor, involuntary servitude, and trafficking in persons.



584. Defendants and or RICO Defendants intent to enslave Tay forced him into labor in Cocoa which resulted to Tay living below the poverty line committing illegal acts to survive as a Exclusive Name and Likeness and 'Hidden Slave' including but not limited to marijuana drug abuse, exchanging food stamps for cash, working legally and illegally under the table as a yardman, a Detail employee for Tropical Motor Sales in Cocoa, working illegally as a housekeeper for Ernie Frank located at [REDACTED] in Suntree, FL, Hattie Whigham at 1415 Clearlake Ave. Apt. 305 in Cocoa, FL (via Island Health and Rehabilitation Center), and working for Thelma and Sherilon and or 807 S. Wilson Residence in exchange for shelter, food, light, litigation resources, marijuana paraphernalia, water and air conditioning pursuant to the March 5, 2009 Document and the Tay Tay Terror Attack.

585. *Respondeat superior* (principal is liable for employer's misconduct: knowledge of, participation in, and benefit from a RICO enterprise).

**Unlawful Acts In Support of Racketeering Enterprises Through  
Interstate and Foreign Travel:**

586. As set forth in the preceding paragraphs, Defendants regularly engaged in and/or conspired to engage in interstate and foreign travel and used the mail or any facility in interstate or foreign commerce to carry on their unlawful activities pursuant to the March 5, 2009 Document pursuant to the *MSN Hotmail Scheme, NSA Scheme, the Education and Employment Scheme, The United States Private Tutoring Scheme, Food Stamp Scheme, Paralegal Scheme, Marijuana Scheme, Delayed Justice Scheme, Defamation Scheme and the Florida Illegal Gambling Scheme* [hereinafter, "Tay Tay Terror Attack"].

587. Defendants frequently engaged in interstate and/or foreign travel and used the mail or any facility in interstate or foreign commerce to effectuate the fraudulent schemes discussed



above including but not limited to 18 USC §§ 1341, 1349, 1343, and 1346 pursuant to the *MSN Hotmail Scheme, NSA Scheme, the Education and Employment Scheme, The United States Private Tutoring Scheme, Food Stamp Scheme, Paralegal Scheme, Marijuana Scheme, Delayed Justice Scheme, Defamation Scheme and the Florida Illegal Gambling Scheme* [hereinafter, “Tay Tay Terror Attack”] on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

588. These willful, knowing and intentional acts violated 18 U.S.C. § 1952 pursuant to the March 5, 2009 Document and the *MSN Hotmail Scheme, NSA Scheme, the Education and Employment Scheme, The United States Private Tutoring Scheme, Food Stamp Scheme, Paralegal Scheme, Marijuana Scheme, Delayed Justice Scheme, Defamation Scheme and the Florida Illegal Gambling Scheme* [hereinafter, “Tay Tay Terror Attack”].

*Unlawful Acts in support of racketeering enterprises through interstate and foreign travel:*

*Interstate and Foreign Travel or Transportation in Aid of Racketeering Enterprise in violation of 18 USC § 1952:*

589. Defendants and or RICO Defendants travels in interstate and foreign commerce or uses the mail or any facility in interstate or foreign commerce with intent to distribute the proceeds of the Tay Tay Terror Attack, or commit any crime or violence to further Tay Terror Attack or otherwise promote, manage, establish, carry on or facilitate the promotion, management, establishment, or carrying on of Tay Terror Attack, and thereafter performs or attempts to perform any act as described herein.

590. The Defendants and or RICO Defendants business enterprise involving gambling, liquor on which the Federal excise tax has not been paid such as “moonshine” and other liquors, narcotics or controlled substances (as defined in section 102(6) of the Controlled Substances



Act), or prostitution offenses in violation of the laws of the State in which they are committed or of the United States, extortion, bribery, or arson in violation of the laws of the State in which committed or of the United States, or any act which is indictable under subchapter II of chapter 53 of title 31, United States Code, or under section 1956 or 1957 of this title and the term “State” includes a State of the United States, the District of Columbia, and any commonwealth, territory, or possession of the United States.

*Unlawful Acts in support of racketeering enterprises through interstate and foreign travel:*

*Transportation of Stolen Goods in violation of 18 USC §§ 2314, 2315:*

591. Defendants and or RICO Defendants transported, or transferred in interstate or foreign commerce Tay’s Name and Likeness and Property including but not limited to securities or money, of the value of \$5,000 or more, knowing the same to have been stolen, converted or taken by fraud pursuant to the March 5, 2009 Document and the *MSN Hotmail Scheme, NSA Scheme, the Education and Employment Scheme, The United States Private Tutoring Scheme, Food Stamp Scheme, Paralegal Scheme, Marijuana Scheme, Delayed Justice Scheme, Defamation Scheme and the Florida Illegal Gambling Scheme* [hereinafter, “Tay Tay Terror Attack”] in violation of 18 USC §§ 1344 (“Bank Fraud”) and 1348 (“Securities and Commodities Fraud”).

592. Defendants and or RICO Defendants having devised or intending to devise the Tay Tay Terror Attack on, before and after February 9, 2009 to defraud, or for obtaining Tay’s money and property by means of false or fraudulent pretenses, representations, or promises, transports or causes to be transported, or induces Tay to travel in, or to be transported in interstate or foreign commerce in the execution or concealment of a scheme or artifice to defraud Tay of money or property having a value of \$5,000 or more.





593. Defendants and or RICO Defendants receives, possesses, conceals, stores, barter, sells, or disposes of any goods, wares, or merchandise, securities, or money of the value of \$5,000 or more, or pledges or accepts as security for a loan any goods, wares, or merchandise, or securities, of the value of \$500 or more pursuant to the March 5, 2009 Document and Tay Tay Terror Attack, which have crossed a State or United States boundary after being stolen, unlawfully converted, or taken, knowing the same to have been stolen, unlawfully converted, or taken.

**Pattern of Related Racketeering Acts**

594. Defendants and or RICO Defendants and co conspirators have engaged in the racketeering activity described in the *MSN Hotmail Scheme*, *NSA Scheme*, *the Education and Employment Scheme*, *The United States Private Tutoring Scheme*, *Food Stamp Scheme*, *Paralegal Scheme*, *Marijuana Scheme*, *Delayed Justice Scheme*, *Defamation Scheme* and the *Florida Illegal Gambling Scheme* [hereinafter, “Tay Tay Terror Attack”] repeatedly since around and or before February 9, 2009 to the present with respect to Tay’s Exclusive Name and Likeness and the March 5, 2009 Document.

595. Defendants and or RICO Defendants rely on the racketeering acts described in this Complaint conduct their regular business activities as described in the *MSN Hotmail Scheme*, *NSA Scheme*, *the Education and Employment Scheme*, *The United States Private Tutoring Scheme*, *Food Stamp Scheme*, *Paralegal Scheme*, *Marijuana Scheme*, *Delayed Justice Scheme*, *Defamation Scheme* and the *Florida Illegal Gambling Scheme* [hereinafter, “Tay Tay Terror Attack”].

596. Under the RICO Act, wire fraud is defined by 18 U.S.C. § 1343, which states in pertinent part:



“Whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of fraud or fraudulent pretenses, representations, or promises, transmits or causes to be transmitted by means of wire, radio, or television communication in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme or artifice...”

597. Defendants and or RICO Defendants operate and manage the racketeering of wire fraud because it publishes and transmits fraudulent advertisements and representations using the radio, television, billboards, sounds, internet and telephone to orchestrate the schematic fraud by luring Tay to be a community leader, educator and entrepreneur in Cocoa, knowing that he will be placed below the poverty line for the sole purpose of generating profits. Defendants are believed to have had television and radio advertisements as well.

598. Under the RICO Act, mail fraud is defined by 18 U.S.C. § 1341, which states in pertinent part:

“Whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of fraud or fraudulent pretenses, representations, or promises...for the purpose of executing such scheme or artifice...places in any post office or authorized depository for mail matter, any matter or thing whatever to be sent or delivered by the Postal Service, or...to be sent or delivered by any private or commercial interstate carrier, or takes or receives therefrom, any such matter or thing...”

599. These racketeering practices constitute a pattern under the RICO Act since they are the normal business practices of RICO Defendants’ fraudulent activities and have been throughout the Tay’s suffering damages.

*Pattern of Racketeering: Conspiracy to Engage in Trafficking in violation of Fl. Stat. 893.135(1)(a) (“cannabis”)*

600. RICO Defendant Dope Boys [hereinafter means, individuals, groups of individuals, carriers, manufacturers and possessors of marijuana, the “United States, State, Cocoa, Brevard, Tallahassee, FAA, Port Authority, LCA Courier, Carnival, Royal Caribbean, FedEx”, University of Mississippi] knowingly sells, purchases, manufactures, delivers or



brings into the State, or is knowingly in actual or construction possession of in excess of 25 pounds of cannabis, or 300 or more cannabis plants (“trafficking cannabis”) and or in excess of 10, 000 lbs or 300 or more cannabis plants used individuals, groups of individuals such as gangs, Marijuana non profit 501(c) organizations, about 23 legalized cannabis states in the United States and Washington D.C.<sup>178</sup>, law enforcement agencies, vehicles, boats, vessels, baggage and common carriers as defined in 18 USC § 341 pursuant to the March 5, 2009 Document and the *MSN Hotmail Scheme, NSA Scheme, the Education and Employment Scheme, The United States Private Tutoring Scheme, Food Stamp Scheme, Paralegal Scheme, Marijuana Scheme, Delayed Justice Scheme, Defamation Scheme and the Florida Illegal Gambling Scheme* [hereinafter, “Tay Tay Terror Attack”].

*Pattern of Racketeering: Bank Fraud 18 USC § 1344*

601. Defendants and or RICO Defendants knowingly executes, or attempts to execute, the Tay Tay Terror Attack to artifice or defraud other financial institutions or to obtain any of the moneys, funds, credits, assets, securities, or other property owned by, or under control of a financial institution, by means of false or fraudulent pretenses, representations or promises including but not limited to the integrity of Tay’s consumer deposits, withdrawals and other transactions with RICO Defendants unfair trade practices, equal opportunities, food stamp funding, education funding, nonprofit funding, terrorist funding and drug trafficking pursuant to the March 5, 2009 Document and the *MSN Hotmail Scheme, NSA Scheme, the Education and Employment Scheme, The United States Private Tutoring Scheme, Food Stamp Scheme, Paralegal Scheme, Marijuana Scheme, Delayed Justice Scheme, Defamation Scheme and the Florida Illegal Gambling Scheme* [hereinafter, “Tay Tay Terror Attack”].

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<sup>178</sup> See <http://medicalmarijuana.procon.org/view.resource.php?resourceID=000881>.



602. Federally regulated RICO Defendants participate in money and or financial transactions with other RICO Defendants and non defendants, statewide legal and federally illegal marijuana dispensaries and other RICO Defendant Dope Boys through interstate and foreign EFT's and other financial transactions as defined in 12 USC § 347d (Transactions between federal and foreign banks)... [matters not considered] through the March 5, 2009 Document and the *MSN Hotmail Scheme, NSA Scheme, the Education and Employment Scheme, The United States Private Tutoring Scheme, Food Stamp Scheme, Paralegal Scheme, Marijuana Scheme, Delayed Justice Scheme, Defamation Scheme and the Florida Illegal Gambling Scheme* [hereinafter, "Tay Tay Terror Attack"] ...

*Pattern of Racketeering: Prohibition of Illegal Gambling Business 18 USC § 1955*

603. RICO Defendants conducted, financed, managed, supervised, directed or owned all or part of an illegal gambling business within the *Illegal Florida Gambling Scheme* [Allied Veterans] within the Tay Tay Terror Attack pursuant to the March 5, 2009 Document and the *Illegal Florida Gambling Scheme* generally which is a violation of State law pursuant to FL Stat. § 849.094 or political subdivision in which it is conducted involves 5 or more persons who conduct, finance, manage, supervise, direct, or own all or part of such business and has been or remains or substantially continuous operation for a period in excess of 30 days or has a gross value of \$2, 000 in a single day.

604. The RICO Defendants involves 5 or more persons who conducted, financed, managed, supervised, directed or owned all or part of the *Illegal Florida Gambling Scheme* pursuant to the Tay Tay Terror Attack and has been or remains or substantially continuous operation for a period in excess of 30 days and or has a gross value of \$2, 000 in a single day.

*Pattern of Racketeering: Forced Labor and Human Trafficking Scheme in violation of 18 USC § 1589(a)(1)(2)*



605. RICO Defendants engaged in the Tay Tay Terror Attack by means of force, threats of force, physical restraint, or physical restraint and or by means of serious harm or threats of serious harm, including but not limited to: criminal detainment; tasers, handcuffs, mase, police K-9, cell bars, waist and feet shackled handcuffs, guns aimed or shooting weapons, police car and van transport, voting rights, denial of personal, private and religious rights; education restraints; medical restraints; seclusion restraint; residual income restraint; FAMU Alumni participant restraint; employment, education, entrepreneurship and political restraint; threats and force of dietary restraint and poor eating habits; threats and force of stability and poverty living; threats of LGBT environment; threats and force of the hip hop culture conspiring to defame Tay; threats and force of a Deeply Rooted In the Community 365 Days a Year restraint by and through the March 5, 2009 Document and or the Tay Tay Terror Attack.

*Pattern of Racketeering: Forced Labor and Human Trafficking Scheme in violation of 18 USC § 1589(a)(3)(b)*

606. RICO Defendants knowingly provided the court orders, reports and recommendations, reply letters and publicity to the internet, and obtained the labor of and from Tay and services as a Pro Se and or indigent Pro Se Plaintiff filing papers and meeting most deadlines, and complying with Court orders by means of the abuse and threatened abuse of law or legal process through the Sham 2009 Litigation – present to cause Tay to believe that if he did not perform such labor or services he would suffer harm such as injunctions, and other harm such as lifelong poverty in Prison Poverty.

*Pattern of Racketeering: Forced Labor and Human Trafficking Scheme in violation of 18 USC § 1589(a)(4)(b)*

607. As set forth in the preceding paragraphs, RICO Defendants in the Tay Tay Terror Attack made and/or conspired to make false promises regarding privacy protection and other



benefits on, before and after February 9, 2009 in a scheme calculated to defraud Tay out of large sums of money, and to defraud Tay's Exclusive Name and Likeness.

608. RICO Defendants knowingly provided the mails, Defendants Weapons of Mass Destruction, Defendants Brands, Defendant Devices, employees, agents, officers, land, ordinances and governing agreements and or joint marketing agreements on and after and before February 9, 2009 to force Tay into the Tay Tay Terror Attack.
609. RICO Defendants knowingly benefited financially, corporately, by and through brand recognition, stocks and salaries and stockholder returns and venture capital, assets, through legal training and or lack thereof pursuant to the Sham 2009 Litigation, as above therein mentioned transactional activity between Defendants, and between Tay' Name and Likeness and Defendants and the reputation of Tay's Name and Likeness, and or anything of value tangible and intangible through contract agreements, oral and mutual, and or employee relationships, and consumer relationships with Tay and Defendants, from the participation in the venture of the March 5, 2009 Document and or the Tay Tay Terror Attack, knowing or in reckless disregard of the fact that the March 5, 2009 Document and or the Tay Tay Terror Attack venture has engaged in the providing or obtaining labor or services of Tay through the Tay Tay Terror Attack on, before and after February 9, 2009 or any other means.
610. RICO Defendants holds and returned Tay to a condition of peonage, with the intent of placing him in or returning him to a condition of peonage pursuant to Title 18 USC §§ 1581, 1592 [Trafficking Victim Protection Act of 2003; HR 2620<sup>179</sup>] by and through the March 5, 2009 Document and or the Tay Tay Terror Attack on, before and after March 5, 2009 in violation of 18 USC § 1589(a)(4).

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<sup>179</sup> <http://www.state.gov/j/tip/laws/61130.htm>



611. Pursuant to Title 18 USC § 1584 the RICO Defendants knowingly and willfully holds Tay to involuntary servitude of poverty as a food stamp slave and working illegally as a Hidden Slave, and sold Tay's Exclusive Name and Likeness to other named and unnamed members of the Tay Tay Terror Attack into a poverty condition of involuntary servitude by trafficking Tay through wires and or devices with his personal Data Info by and through the March 5, 2009 Document and or the Tay Tay Terror Attack.
612. Pursuant to Title 18 USC § 1589 the RICO Defendants knowingly provides or obtains the labor or services of Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack by means of serious harm including but not limited to denying him employment, education and equitable relief or threats of serious harm to Tay including but not limited to denying Tay education, employment, equitable relief, due process and equal protections of the law; (3) by means of the abuse or threatened abuse of law or legal process; (4) by means of the Tay Tay Terror Attack through any scheme, plan, or pattern intended to cause the person to believe that, if Tay did not perform a drug test to become employed by the School Board, he would suffer serious harm such as unemployment and could not teach in Brevard's Public Schools and suffer severe livelihood damages. The Defendants knowingly benefits, financially or by anything of value from participation in a venture which has engaged in the providing or obtaining of labor or services by the means herein, knowing or in reckless disregard of the fact that the venture (the Tay Tay Terror Attack) has engaged in the providing or obtaining of labor or services by any of such means by and through the Tay Tay Terror Attack pursuant to the March 5, 2009 Document.



613. The March 5, 2009 Document and the Tay Tay Terror Attack was to alienate, abandon and isolate Tay from the norms of society to force him to live in hostile living environment [“Prison Poverty”] and conditions causing holistic health harm, and to limit his outside contacts, including unlawful discrimination in violation of 42 U.S.C. § 1981, which were designed to coerce Tay into believing that he would suffer serious harm if he did not pursue a quality education, use his intellectual property and trade secrets for the betterment of the United States, participate in a drug test for employment as a teacher with the School Board by and through the Tay Tay Terror Attack pursuant to the March 5, 2009 Document.
614. Tay is entitled to recover compensatory and punitive damages in an amount to be proven at trial, including attorneys’ fees pursuant to 18 USC § 1595 (Civil Remedy).

*Pattern of Racketeering: Mail Fraud and Wire Fraud: 18 U.S.C. §§ 1341, 1343*

615. As set forth in the preceding paragraphs, RICO Defendants in the Tay Tay Terror Attack made and/or conspired to make false promises regarding privacy protection and other benefits in a scheme calculated to defraud Tay out of large sums of money, and to defraud Tay’s Exclusive Name and Likeness and Property.
616. As set forth in the preceding paragraphs, RICO Defendants in Tay Tay Terror Attack pursuant to the March 5, 2009 Document used the mails on numerous occasions to further this fraudulent scheme on, before and after February 9, 2009.
617. The RICO Defendants corruptly used or attempted to use his and or her official position or any property or resource which may be within his or her trust, or perform his or her official duties, to secure a special privilege, benefit, or exemption for himself, herself, or others such as retirement and pensions pursuant to Fl. Stat. 112§ 313(6) to return Tay to poverty.





618. As set forth fully in the preceding paragraphs, RICO Defendants in the Tay Tay Terror Attack used devices including wire communications via telephone, fax, computers, radio, television, and/or email on numerous occasions to further the March 5, 2009 Document and or the Tay Tay Terror Attack.

619. These willful, knowing, and intentional acts constitute wire fraud in violation of 18 U.S.C. § 1343 and including but not limited to 18 USC §§ 1018 and 1365. These willful, knowing, and intentional acts constitute mail fraud in violation of 18 U.S.C. §§ 665 (Theft from employment and training funds), 1018 (Official Writing and Certificate), § 1592 (Unlawful Conduct with respect to documents in peonage), § 1831 (Frauds and Swindles), 42 USC § 1981a, 1982, 1983, 1985(3), and 1986.

620. In furtherance of the March 5, 2009 Document and or the Tay Tay Terror Attack, and as described herein, the RICO Defendants transmitted, or caused to be transmitted, by means or wire communications in interstate or foreign commerce, writings, signs, signals, pictures, and sounds and also caused matter s and things to be placed in any post office or authorized depository, or deposited caused to be, matters or things to be sent or delivered by a private or commercial interstate carrier to Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack including but not limited to :

- a. Emails and website postings, incorporating false and misleading statements regarding a K-20 education curriculum, an equal employment opportunity, the American Dream and an adequate livelihood as a Cocoa citizen.
- b. Writings and or mailings between and among the RICO Defendants concerning the preparation of the March 5, 2009 Document, and Tay's food stamp notice.



- c. Communication directed toward U.S. State and federal government officials and regulators incorporating false and misleading statements regarding Tay's liability.
- d. Funds transferred by the RICO Defendants to the Defendants with the intent that those funds be used to promote the carrying on of the RICO Defendants criminal activities;
- e. Electronic filings and service of court papers containing false and misleading statements intended to impede the operation of the court;
- f. Food stamp notifications from the State that Tay would be receiving and eligible to receive \$200 per month from October to February 10, 2014 and cutting his eligible balance to \$189 without notification knowing that the information was false.

621. Tay incorporates by references which sets forth particular uses of wire and mail communications in furtherance of the Tay Tay Terror Attack or artifice to defraud that constitute violations of 18 USC §§ 1341 and 1343, including which individual RICO Defendant caused the communication to be mailed or wired, when the communication was made, and how it furthered the RICO Defendants fraudulent scheme.

*Pattern of Racketeering: Fraud with identification and authentication in violation of 18 USC § 1028*

622. RICO Defendants knowingly possesses an identification document, authentication feature, or a false identification document [March 5, 2009 Document], with the intent such document or feature be used to defraud Tay and the public.

623. State RICO Defendants knowingly transfers, possesses, or uses, without lawful authority, a means of identification of Tay's equal employment opportunity (Tay's urine test) with the



intent to commit, or to aid or abet, or in connection with, any unlawful activity that constitutes a violation of Federal law, or that constitutes a felony under any applicable State or local law. The RICO Defendants had no legal authority to prejudice Tay before and after February 9, 2009 stating he failed a drug test on February 24, 2009 without any results enclosed and sending the March 5, 2009 Document to Tay.

624. The RICO Defendants knowingly traffics in false or actual authentication features for use in false identification documents, document-making implements, or means of identification. The RICO Defendants knowingly trafficked Tay's Name and Likeness and Property through the School Board and State RICO Defendants employment hoax including but not limited to the State's Chain of Custody form, his application to be a substitute teacher, the March 5, 2009 Document, his food stamp notice, defamed court orders and public records.

*Pattern of Racketeering: Obstruction of Justice and Injuring a Officer Generally in violation of 18 USC §§ 1503, 1511*

625. RICO Defendants corruptly, or by threats or force, or by any threatening letter or communication, endeavors to influence, intimidate, or impede the obstruction of justice of Tay [a Pro Se officer] by: intimidating, endeavoring to influence and threatening Tay with a \$50 offer of judgment; a \$2 million insurance policy from AIG; by stating Tay failed a drug test on February 24, 2009 with no results and knowing he took a drug test on February 23, 2009 through his Chain of Custody in the Middle District of Florida – Orlando Division.
626. The United States corruptly, or by threats or force, or by any threatening letter or communication, endeavors to influence, intimidate, or impede the obstruction of justice of Tay [a Pro Se officer] in or of the Middle District of Florida – Orlando Division by stating Tay is not qualified to teach in public schools; and not providing Tay any relief for the



damages he suffered from the Tay Tay Terror Attack from the Smith 2009 Litigation thereafter.

627. The RICO Defendants pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack obstructed the enforcement of the criminal laws of the State subdivision as defined herein, with the intent to facilitate an illegal gambling business as RICO Defendants engaged in the Tay Tay Terror Attack to effect Tay's livelihood of such a conspiracy [Tay Tay Terror Attack]; one or more of such persons is an official or employee, elected, appointed, or otherwise, of such State; and the State conducted, financed, managed, supervised, directed, or owned all or part of an illegal gambling business by selling Tay the chance to win employment or a equal employment opportunity and or adequate living on, before and after February 9, 2009.

*Pattern of Racketeering: Retaliation of a victim or witness in violation of 18 USC § 1513*

628. RICO Defendants knowingly, with the intent to retaliate, takes any action harmful to Tay, including interference with the lawful employment or livelihood of Tay, for providing to the USDOJ any truthful information relating to the acts of the School Board and State RICO Defendants, and the United States.

629. RICO Defendants retaliated against and intimidated Tay's livelihood by offering him a \$50 offer of judgment and a submission of a false – positive drug result from LabCorp and Neil Dash in the Middle District of Florida – Orlando Division.

630. The RICO Defendants interfered with, retaliated against and intimidated Tay's livelihood and his lawful employment with the School Board and State by and through the April Fool's Order by stating Tay is not qualified to teach in School Board and State's public schools;



denying him any and all relief requested; and denying him for any and all claims filed with the EEOC, the USDOJ, the USDOL, and the USDHHS.

*Pattern of Racketeering: Witness Tampering in violation of 18 USC § 1512*

631. RICO Defendants knowingly engaged in intimidation, threats, misleading conduct and corrupt persuasion toward Tay, with specific intent to influence, delay and prevent Tay and RICO Defendants testimony or cause Tay and RICO Defendants to withhold records, objects, documents and testimony from an official proceeding in the Smith 2009 Litigation on, before and after the April Fool's Order.

*Pattern of Racketeering: Money Laundering in violation of Hobbs Act 18 USC § 1951,*

632. At all times material to this Complaint, Tay was engaged in interstate commerce and in multiple industries that affects interstate and foreign commerce.

633. As described herein, the RICO Defendants have engineered a wide ranging campaign of public attacks based on false and misleading statements, a threatened and actual fraudulent civil judgment, investigations by government agencies and ongoing harassment and disruptions of business operations, all with the intent and effect of causing a reasonable fear of economic loss on the part of Tay on, before and or after February 9, 2009 with Dirty Money.

634. As described herein, the RICO Defendants manufactured false evidence against Tay and are relying on that false evidence pursuant to the March 5, 2009 Document and the Tay Tay Terror Attack with the intent and affect causing a reasonable fear of economic loss on the part of Tay.

635. As described herein, the RICO Defendants actions are intended to induce fear in Tay that the Defendants will, among, other things: 1) continue to pursue a scheme of



misrepresentation to grant harm and public denigration of Tay, unless and until Tay “settles” the Smith 2009 Litigation; 2) continue to conspire with the State to have Tay deeply rooted in poverty, and 3) to continue to defame Tay’s Name and Likeness. These actions, as described herein, have created a reasonable fear of harm on the part of Tay, including fear of economic loss.

636. Defendants’ racketeering acts have similar purposes: to profit from the fraudulent recruitment and forced labor of Tay’s Exclusive Name and Likeness and Property on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack.

637. RICO Defendants’ acts on, before and or after February 9, 2009 pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack have yielded similar results and caused similar injuries to Tay’s Name and Likeness and Property.

638. The RICO Defendants engaged in and affects interstate commerce by fraudulently marketing and distributing its products [Equal Employment Opportunity... and or the American Dream] in interstate commerce before and after February 9, 2009 pursuant to the March 5, 2009 Document.

639. Accordingly, the RICO Defendants have unlawfully obstructed, delayed and affected – and attempted – to obstruct, delay, and affect – commerce as the term defined in 18 USC §1951 and the movement of articles and commodities in such commerce, by extortion as that term defined in §1951, in that the RICO Defendants attempted to induce Tay to relinquish property through the wrongful use of actual and threatened force and fear – including fear of economic harm pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack.



640. The RICO Defendants operate and manage the racketeering activity of mail fraud because Defendants made false representations of Tay's Exclusive Name and Likeness and Property, and published false advertisements conceived by the RICO Defendants for the purpose of driving the Defendant's profits by falsely representing to citizens that they would have an equal opportunity to obtain and acquire the Self Made American Dream through education, employment, entrepreneurship and entertainment, and used the mail, wires and banks to orchestrate this activity and to execute the fraud pursuant to the March 5, 2009 Document and the Tay Tay Terror Attack.

*Pattern of Racketeering: Money Laundering in violation of 18 USC §§ 1956(a)(2)(A), 1957*

641. RICO Defendants, have on multiple occasions, acting in the individual capacities as agents and or officers have knowingly caused the transportations, transmissions, and or the transfer funds to or from the U.S. and foreign countries to themselves and other entities with the intent that those funds be used to promote the carrying on of unlawful activity, including but not limited to violations of 18 USC § 1341, 1343, 1951, 1952, 1954, 1955, 1956 and 1957 such as the March 5, 2009 Document where payment to the School Board and State RICO Defendants from complicity and silence as to the March 5, 2009 Document's authorship, and the food stamp eligibility notice where payment to Chase and the State, the funding of the RICO Defendants enslavement campaign against Tay, and collusion with the School Board and the State pursuant to the Tay Tay Terror Attack.

642. RICO Defendants knowing on, before and after February 9, 2009 that Tay's Name and Likeness and Property involved in financial transactions represents the proceeds of the Tay Tay Terror Attack, conducts or attempts to conduct such a financial transaction which in fact involves the proceeds of theft, or embezzlement of public funds by or for the benefit of a



public official and the trafficking, transporting, recruiting and harboring of Tay;— with the intent to promote the carrying on of theft, or embezzlement of public funds by or for the benefit of a public official and the trafficking, transporting, recruiting and harboring of Tay; or knowing that the transaction is designed in whole or in part— to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of theft, or embezzlement of public funds by or for the benefit of a public official and the trafficking, transporting, recruiting and harboring of Tay. On, before and after March 5, 2009, the RICO Defendants laundered money and monetary instruments within the Tay Tay Terror Attack and Tay Tay Terror Attack in violation of 18 USC § 1956(a)(2)(A) pursuant to the March 5, 2009 Document and Tay Tay Terror Attack.

643. RICO Defendants knowingly engaged or attempted to engage in a monetary transaction(s) in criminally derived property such as Tay's equal employment opportunity, his Self Made American Dream, his K-20 Education, his urine sample and Tay's livelihood which is of a value greater than \$10,000 and is derived from the March 5, 2009 Document and the Tay Tay Terror Attack. RICO Defendants are in violation of 18 USC § 1957.

*Pattern of Racketeering: Extortion in violation of Fl. Stat. § 836.05*

644. Similarly, the RICO Defendants wrongful attempts to appropriate Tay's property by the instilling the fear of poverty into Tay, RICO Defendants would perform an act calculated to harm Tay materially with respect to his personal and business reputation and financial condition violates Fl. Stat. 836.05.

645. The RICO Defendants directly or indirectly, corruptly gives, offers or promises profits and benefits from Employee Benefits plan to United States, or offers or promises any public official or any person who has been selected to be a public official to give anything of value





to any other person or entity, with intent to influence any official act, and or to influence such public official or person who has been selected to be a public official to commit or aid in committing, or collude in, or allow, any fraud, or make opportunity for the commission of any fraud in the *MSN Hotmail Scheme, NSA Scheme, the Education and Employment Scheme, The United States Private Tutoring Scheme, Food Stamp Scheme, Paralegal Scheme, Marijuana Scheme, Delayed Justice Scheme, Defamation Scheme and the Florida Illegal Gambling Scheme* [hereinafter, "Tay Tay Terror Attack"] Tay Tay Terror Attack, on Tay.

646. Acquisition. Under § 1962(b), it is unlawful to acquire or maintain any interest in, or control of, any enterprise through a pattern of racketeering activity.

647. Participation. Under § 1962(c), it is unlawful for any person to conduct or participate in the conduct of the affairs of an enterprise through a pattern of racketeering activity.

648. Conspiracy. Under § 1962(d), it is "unlawful for any person to conspire to violate any of the provisions of" § 1962(a)(c).

649. A large body of law has grown up around each of these subsections. This column focuses on standing to sue for civil RICO conspiracy, under § 1962(d).

650. The RICO Defendants form an enterprise under the RICO Act within the meaning of 18 U.S.C. § 1961 and engage in, or the activities of which affect, interstate or foreign commerce such as the *MSN Hotmail Scheme, NSA Scheme, the Education and Employment Scheme, The United States Private Tutoring Scheme, Food Stamp Scheme, Paralegal Scheme, Marijuana Scheme, Delayed Justice Scheme, Defamation Scheme and the Florida Illegal Gambling Scheme* [hereinafter, "Tay Tay Terror Attack"]. The fraudulent representations pursuant to



the March 5, 2009 Document and or the Tay Tay Terror Attack described above were made by the Defendants to Tay.

651. The fraudulent representations set forth above represented a scheme and artifice to defraud Tay, which was facilitated by use of the advertising sign, the United States mail, email, telephones and online websites, and caused by the Defendants, and resulting in mail fraud within the meaning of 18 U.S.C. § 1341 and § 1346 pursuant to the March 5, 2009 Document.

652. RICO Defendants are in violation of Defendants War Crimes: Title 18 USC §1028 (Fraud and related activities in connection with identification documents, authentication features and information), Title 18 USC §1002 (Possession of False Papers to defraud the United States), Title 18 USC § 1341 (Frauds and Swindles), Title 18 USC §1035 (False Statements relating to health care matters), Title 18 USC § 1346 (Definition of Scheme of Artifice to defraud). Therefore all in violation of Title 18 § 241 (Conspiracy Against Rights), and Title 18 USC § 371, and Title 18 USC § 246 (Deprivation of Relief Sought), §247 (Obstruction of persons in the free exercise of religious beliefs) (a)(2), §653 (Disbursing Officer Misusing Public Funds), §665 (Theft or embezzlement from employment and training funds...) , §669 (Theft and Embezzlement with Health Care), §641 (Public Money, property, or records), §1001 (Statements or entries generally) (a) (1)(2)(3), §1002 (Possession of false papers to defraud the U.S.), §1028, §1035 (False Statements relating to health care matters), §1341 (Frauds and Swindles), §1346 (Definition of “scheme or artifice” to defraud), 1365 (Tampering with Consumer Products), 1513(e), 1546, 1581 (Peonage; Obstructing Enforcement) and § 1589 (Forced Labor) (a)(4) (“scheme and plan”) “does not



require that one of the conspirators commit an OVERT ACT prior to the conspiracy becoming a crime and does contain the “OPPRESS” clause.

653. RICO Defendants knowingly and intentionally chose the *Concerted* posture. *Concerted* actions “is any manner or for any purposes” are illegal under Title 18 USC § 371 Conspiracy Laws of the United States where the RICO Defendants knew of Tay’s Exclusive Name and Likeness and his future endeavors and of his pending and or closed judicial proceedings on, before and after February 9, 2009. Inferences of agreement may be drawn: if there be a concert of action of parties working together understandingly, with a single design for the accomplishment of a common purpose” *U.S. v. Montoya – Ortiz* 627 F. 2d 886, 890 (9 Cir. 1980) and *U.S. v. Montoya – Ortiz* 7 F. 3d. 1171 (Cir. 1993).

654. During discovery co-conspirators or those around them will know what information a RICO Defendant possessed and will support charge of willful blindness in conspiracy. Willful Blindness or Intentional Ignorance will not Exculpate Defendants from Conspiracy. RICO Defendants acts were done “*willful and knowingly*” pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack.

655. The measure for the Defendants “is not directed by the success of the corruption but by the “*endeavor*”. Endeavors need not be successful to be criminal. Although no formal agreement is needed an understanding is an agreement.”

656. Pursuant to 18 U.S.C. § 1964(c), Tay seek “threefold the damages” suffered by he, as well as “... including a reasonable attorney’s fee.”

657. Accordingly, the RICO Defendants have unlawfully obstructed, delayed and affected – and attempted to obstruct, delay and affect – commerce as that term is defined in 18 USC § 1951, and that movement of articles and commodities in such commerce, by extortion, as that



term is defined in § 1951, in that RICO Defendants attempted to induce Tay to consent to relinquish property through the wrongful use of actual and threatened force, violence and fear – including fear of economic harm pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack.

658. Tay also seeks all other equitable and legal remedies available under the RICO Act.

**COUNT 13 - Acquisition and Maintenance of an Interest in and Control of  
an Enterprise Engaged in a Pattern of Racketeering Activity:  
18 U.S.C. §§ 1961(5), 1962(b)**

[All Defendants and or RICO Defendants, excluding any and or all agencies of the United States, or any officer or employee of the United States or any agency thereof acting within his or her official capacity or under color of legal authority; or a foreign state, an agency of a foreign state, or an officer or employee of a foreign state or an agency thereof acting within his or her official capacity or under color of legal authority]

659. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over forms by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

660. Tay is a person under §1961(3).

661. RICO Defendants form an enterprise and are an enterprise under §1961(4) pursuant to the March 5, 2009 Document and or the *MSN Hotmail Scheme, NSA Scheme, the Education and Employment Scheme, The United States Private Tutoring Scheme, Food Stamp Scheme, Paralegal Scheme, Marijuana Scheme, Delayed Justice Scheme, Defamation Scheme and the Florida Illegal Gambling Scheme* [hereinafter, “Tay Tay Terror Attack”].



662. State. Under § 1961(2), means Florida and any State of the United States, the District of Columbia, the Commonwealth of Puerto Rico, any territory or possession of the United States, any political subdivision, or any department, agency, or instrumentality thereof.
663. At various times and places partially enumerated in Tay's Data Info, all RICO Defendants did acquire and/or maintain, directly or indirectly, an interest in or control of a RICO *enterprise* of individuals who were associated in fact and who did engage in, and whose activities did affect, interstate and foreign commerce, all in violation of 18 U.S.C. §§ 1961(4), (5), (9), and 1962(b) pursuant to the March 5, 2009 Document and the *MSN Hotmail Scheme, NSA Scheme, the Education and Employment Scheme, The United States Private Tutoring Scheme, Food Stamp Scheme, Paralegal Scheme, Marijuana Scheme, Delayed Justice Scheme, Defamation Scheme and the Florida Illegal Gambling Scheme* [hereinafter, "Tay Tay Terror Attack"].
664. On, before and after March 5, 2009, all Defendants did cooperate jointly and severally in the commission of two (2) or more of the RICO predicate acts that are itemized in the RICO laws at 18 U.S.C. §§ 1961(1)(A) and (B), and did so in violation of the RICO law at 18 U.S.C. 1962(b) (Prohibited activities) pursuant to the March 5, 2009 Document.
665. The RICO Defendants and their co-conspirators are a group of persons associated together in fact for the common purpose of carrying out an ongoing criminal enterprise, as described in the foregoing paragraphs of this Complaint; namely through a multi faceted campaign of lies, fraud, threats and official corruption, to coerce Tay into paying amounts of money to the RICO Defendants and the co-conspirators for an opportunity to obtain and acquire his Self Made American Dream through education, employment and entrepreneurship. These RICO Defendants and co-conspirators have organized their



operation into a cohesive group with specific and assigned responsibilities and a command structure, operating in the U.S., funded primarily from the U.S. and directed mainly from the U.S. Over the years they have adapted their scheme to changing circumstances, recruiting new members to their operation, and expanding the scope and nature of their activities. While the organization of the criminal Enterprise has changed over time and its members may have held different roles at different times, the criminal enterprise has generally been structured to operate as a unit in order to accomplish the goals of their criminal scheme pursuant to the March 5, 2009 Document and the *MSN Hotmail Scheme*, *NSA Scheme*, *the Education and Employment Scheme*, *The United States Private Tutoring Scheme*, *Food Stamp Scheme*, *Paralegal Scheme*, *Marijuana Scheme*, *Delayed Justice Scheme*, *Defamation Scheme* and the *Florida Illegal Gambling Scheme* [hereinafter, "Tay Tay Terror Attack"].

666. The RICO Defendants and their co conspirators constitute an association in fact enterprise within the meaning of 18 USC §§1961(4) and 1962(c), referred to hereinafter as the "Enterprise." Each of the RICO Defendants participated in the operation or management of the March 5, 2009 Document and the *MSN Hotmail Scheme*, *NSA Scheme*, *the Education and Employment Scheme*, *The United States Private Tutoring Scheme*, *Food Stamp Scheme*, *Paralegal Scheme*, *Marijuana Scheme*, *Delayed Justice Scheme*, *Defamation Scheme* and the *Florida Illegal Gambling Scheme* [hereinafter, "Tay Tay Terror Attack"] Enterprise.

667. At all times relevant, the RICO Defendants was engaged in the Tay Tay Terror Attack, and its activities affected interstate and foreign commerce within the meaning of 18 USC § 19629(c).

668. Tay further alleges that RICO Defendants did commit two (2) or more of the offenses itemized above in a manner which they calculated and premeditated intentionally to threaten



continuity, *i.e.* a continuing threat of their respective *racketeering activities*, on and after March 5, 2009, also in violation of the RICO law at 18 U.S.C. 1962(b) *supra*.

669. Pursuant to the original Statutes at Large, the RICO laws itemized above are to be *liberally* construed by this honorable Court. Said construction rule was never codified in Title 18 of the United States Code, however. See 84 Stat. 947, Sec. 904, Oct. 15, 1970.

670. *Respondeat superior* (principal is liable for employer's misconduct: knowledge of, participation in, and benefit from a RICO enterprise).

671. Tay suffers severe and extreme damages and is due punitive damages.

WHEEFORE, Tay prays for judgment as set forth below.

**Count 14 - Conspiracy to Engage in a  
Pattern of Racketeering Activity:  
18 U.S.C. §§ 1961(5), 1962(d)**

[All Defendants and or RICO Defendants, excluding any and or all agencies of the United States, or any officer or employee of the United States or any agency thereof acting within his or her official capacity or under color of legal authority; or a foreign state, an agency of a foreign state, or an officer or employee of a foreign state or an agency thereof acting within his or her official capacity or under color of legal authority]

672. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits.

673. At various times and places partially enumerated in Tay's *documentary material*, RICO Defendants did conspire to acquire and maintain an interest in a RICO *enterprise* engaged in a *pattern of racketeering activity*, in violation of 18 U.S.C. §§ 1962(b) and (d) pursuant to the March 5, 2009 Document and the *MSN Hotmail Scheme, NSA Scheme, the Education and Employment Scheme, The United States Private Tutoring Scheme, Food Stamp Scheme, Paralegal Scheme, Marijuana Scheme, Delayed Justice Scheme, Defamation Scheme and the*



*Florida Illegal Gambling Scheme* [hereinafter, “Tay Tay Terror Attack”] on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

674. At various times and places partially enumerated in Tay’s Data Info, RICO Defendants did also conspire to conduct and participate in said RICO *enterprise* through a *pattern of racketeering activity*, in violation of 18 U.S.C. §§ 1962(c) and (d) on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the *MSN Hotmail Scheme, NSA Scheme, the Education and Employment Scheme, The United States Private Tutoring Scheme, Food Stamp Scheme, Paralegal Scheme, Marijuana Scheme, Delayed Justice Scheme, Defamation Scheme and the Florida Illegal Gambling Scheme* [hereinafter, “Tay Tay Terror Attack”].

675. See also 18 U.S.C. §§ 1961(4), (5) and (9).

676. On, before and after February 9, 2009 pursuant to the March 5, 2009 Document all Defendants did cooperate jointly and severally in the commission of two (2) or more of the predicate acts that are itemized at 18 U.S.C. §§ 1961(1)(A) and (B), in violation of 18 U.S.C. 1962(d) pursuant to the March 5, 2009 Document and the *MSN Hotmail Scheme, NSA Scheme, the Education and Employment Scheme, The United States Private Tutoring Scheme, Food Stamp Scheme, Paralegal Scheme, Marijuana Scheme, Delayed Justice Scheme, Defamation Scheme and the Florida Illegal Gambling Scheme* [hereinafter, “Tay Tay Terror Attack”].

677. Tay further alleges that RICO Defendants did commit two (2) or more of the offenses itemized above in a manner which they calculated and premeditated intentionally to threaten continuity, *i.e.* a continuing threat of their respective *racketeering activities*, also in violation





of 18 U.S.C. 1962(d) (Prohibited activities *supra*) on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

678. Pursuant to 84 Stat. 947, Sec. 904, Oct. 15, 1970, the RICO laws itemized above is to be *liberally* construed by this honorable Court. Said construction rule was never codified in Title 18 of the United States Code, however. *Respondeat superior*. The Doctrine of *Respondeat Superior* has been used in determining a medical provider's negligence.

679. Pursuant to Sec. 817. 565, FL. Stat., It is unlawful for any person: (a) Willfully to defraud or attempt to defraud any lawfully administered urine test designed to detect the presence of chemical substances or controlled substances on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

680. Pursuant to Fl. Stat. 112.0455(4) the RICO Defendants had no legal duty to drug test Tay for employment as a substitute teacher for Brevard Public Schools, and willful defrauded and attempted to defraud Tay's February 23, 2009 lawfully administered urine test designed to detect the presence of marijuana metabolites on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack.

681. The RICO Defendants defrauded and attempted to defraud Tay's urine test on, before and after February 9, 2009 inconclusively with a controlled substance such as, marijuana by the overt acts in his employment procedure pursuant to the Tay Tay Terror Attack.

682. The above styled acts and practices of RICO Defendants have injured and will likely continue to injure and prejudice Tay and the public on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

683. This RICO Defendants has deceived Tay and the public and physically and emotionally harmed Tay pursuant to the March 5, 2009 Document and the Tay Tay Terror Attack.



684. Tay and suffers irreparable and extreme damages.

WHEEFORE, Tay prays for judgment as set forth below.

**COUNT 15 – SCHEME TO FALSELY IMPRISON**

**In violation of FL. Stat. 787.02; 18 USC § 1346; and 18 USC § 1589(a)(4)**

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**

685. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as

if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits.

686. The Defendants forced Tay into a scheme of opportunity and acted to unlawfully and unreasonably detain Tay against his will and consent by force, threat to secretly to confine, imprison and harbor him on food stamps with no residual income to invest in his business endeavors, purchase a vehicle to travel, a personal home for adequate living pursuant to the herein the March 5, 2009 Document and or the Tay Tay Terror Attack on, before and after March 5, 2009. The Defendants are liable to Tay's Exclusive Name and Likeness and Property for damages, including compensatory and punitive damages on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack.

687. Defendants acted with malice, gross negligence, and/or reckless disregard.

688. Tay suffered injury as a result of the Defendant's actions and is entitled to relief.

**COUNT 16 –LIBEL, DEFAMATION OF CHARACTER IN HEALTH CARE AND OR DRUG TESTING**

**(Fl. Stat. § 836.11, Ku Klux Klan Act, 42 § 1981A)**

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**

689. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as

if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits.

690. Defendants concealed a fraudulent drug test from Tay that he took on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack and



published one or more written false statements about the fraudulent drug testing which were intended to impeach and impugn Tay's honesty, integrity, virtue, and reputation and were published by and through interstate commerce as a public record including but not limited to:

a. "Tay is not qualified to teach in [Florida's] public schools."

691. Defendants knew and should have known that those statements would cause Tay severe damages. Defendants are at fault for publishing that information causing harm to Tay. Tay is entitled to relief.

**COUNT 17 - Violation of the Right to Be Free from Unreasonable Searches and Seizures in Violation of the 4<sup>th</sup> Amendment of the United States Constitution**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

692. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits.

693. Pursuant to the March 5, 2009 Document, Defendants' main recruiting agents in the United States held Tay's social security number, date of birth, drivers license number, IP addresses, cable service, his education level, his ethnicity, his color, his work history, email, or food stamp card, or cell phone serial numbers, and or other personal information [hereinafter, "Data Info" or "DNA<sup>180</sup> Profile"] and threatened, coerced, and defrauded Tay's Exclusive Image and Likeness, Name and Likeness and Property and those Plaintiff's into

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<sup>180</sup> Or deoxyribonucleic acid, which contains the biological instructions that make each species unique, DNA, along with the instructions it contains, is passed from adult organisms to their offspring during reproduction; is the hereditary material in humans and almost all other organisms. DNA contains the instructions needed for an organism to develop, survive and reproduce. To carry out these functions, DNA sequences must be converted into messages that can be used to produce proteins, which are the complex molecules that do most of the work in our bodies. Besides the DNA located in the nucleus, humans and other complex organisms also have a small amount of DNA in cell structures known as mitochondria. Mitochondria generate the energy the cell needs to function properly.



paying extraordinary fees for education, entertainment, employment and entrepreneurship processing, travel and any and all other necessary costs and fees.

694. Defendants further caused Tay to believe that if he and they did not work for or in the United States, he or they would suffer abuse or threatened abuse of the legal process, physical restraint, and/or other serious harms including but not limited to jail, murders, genocide, cancerous deceases and or viruses, and absolute poverty.

695. The RICO Defendants unconstitutionally seized and searched Tay's Exclusive Name and Likeness and Data Info including but not limited to his email, financial statements, trade secrets, religions and consumer drug (marijuana) on, before and after February 9, 2009 causing Tay severe and extreme damages pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack.

**COUNT 18 - Violation of the Right to Be Free from Unreasonable Searches and Seizures  
in Violation of the 4<sup>th</sup> Amendment of the United States Constitution**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

696. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits.

697. Pursuant to the *NSA Scheme*, Defendants' main recruiting agents in the United States held Tay's social security number, date of birth, drivers license number, IP addresses, cable service, his education level, his ethnicity, his color, his work history, email, or food stamp card, or cell phone serial numbers, and or other personal information [hereinafter, "Data Info" or "DNA<sup>181</sup> Profile"] and threatened, coerced, and defrauded Tay's Exclusive Image

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<sup>181</sup> Or deoxyribonucleic acid, which contains the biological instructions that make each species unique, DNA, along with the instructions it contains, is passed from adult organisms to their offspring during reproduction; is the hereditary material in humans and almost all other organisms. DNA contains the instructions needed for an organism to develop, survive and reproduce. To carry out these functions, DNA sequences must be converted into messages that can be used to produce proteins, which are the complex



and Likeness, Name and Likeness and Property and those Plaintiff's into paying extraordinary fees for education, entertainment, employment and entrepreneurship processing, travel and any and all other necessary costs and fees.

698. Defendants further caused Tay to believe that if he and they did not work for or in the United States, he or they would suffer abuse or threatened abuse of the legal process, physical restraint, and/or other serious harms including but not limited to jail, murders, genocide, cancerous deceases and or viruses, and absolute poverty.

699. The Defendants unconstitutionally seized and searched Tay's Exclusive Name and Likeness and Data Info including but not limited to his conversations, communications, emails, financial statements, trade secrets, religions and consumer drug (marijuana) on, before and after February 9, 2009 causing Tay severe and extreme damages pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack.

**COUNT 19 - GROSS NEGLIGENCE, TORTIOUS INTERFERENCE WITH  
CONTRACT, BREACH OF CONTRACT, BREACH OF DUTY, BREACH OF  
FIDUCIARY DUTY, FRAUD IN THE INDUCEMENT, FRAUDULENT  
MISREPRESENTATION, HONEST SERVICE FRAUD and BREACH OF IMPLIED  
COVENANT GOOD FAITH**

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**  
700. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as

if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits.

701. The Defendants owed the duties of care to Tay, the Defendants breached those duties on, before and after March 5, 2009 pursuant to the March 5, 2009 Document and the Tay Tay Terror Attack, and that as a result, Tay suffers injuries and other damages.

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molecules that do most of the work in our bodies. Besides the DNA located in the nucleus, humans and other complex organisms also have a small amount of DNA in cell structures known as mitochondria. Mitochondria generate the energy the cell needs to function properly.



702. Because the Defendants breach was the cause of Tay's injuries, Tay is entitled to compensation from the Defendants.

**COUNT 20 - 42 USC § 1986  
(ACTION FOR NEGLIGENCE TO PREVENT)**

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**

703. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

704. The above is applicable to this court by application of Article VI of the U.S.C. "... federal courts, have a constitutional obligation to safeguard personal liberties and to uphold federal law."

705. The Defendants had knowledge that the wrongs conspired to be done are about to be committed in the *MSN Hotmail Scheme*, and having power to prevent or aid in preventing the commission of the same, neglects or refuses so to do, if such wrongful act be committed on, before and after March 5, 2009 pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack, shall be liable to Tay for all damages caused by such wrongful act, which such person by reasonable diligence could have prevented.

706. As a result, Tay suffers injuries from the actions to prevent neglect and is entitled to relief.

**COUNT 21 - 42 USC § 1986  
(ACTION FOR NEGLIGENCE TO PREVENT)**

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**

707. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.



708. The above is applicable to this court by application of Article VI of the U.S.C. "...federal courts, have a constitutional obligation to safeguard personal liberties and to uphold federal law."

709. The Defendants had knowledge that the wrongs conspired to be done are about to be committed in the *NSA Scheme*, and having power to prevent or aid in preventing the commission of the same, neglects or refuses so to do, if such wrongful act be committed on, before and after March 5, 2009 pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack, shall be liable to Tay for all damages caused by such wrongful act, which such person by reasonable diligence could have prevented.

710. As a result, Tay suffers injuries from the actions to prevent neglect and is entitled to relief.

**COUNT 22 - 42 USC § 1986**  
**(ACTION FOR NEGLIGENCE TO PREVENT)**

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**

711. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

712. The above is applicable to this court by application of Article VI of the U.S.C. "...federal courts, have a constitutional obligation to safeguard personal liberties and to uphold federal law."

713. The Defendants had knowledge that the wrongs conspired to be done are about to be committed in the *Education and Employment Scheme*, and having power to prevent or aid in preventing the commission of the same, neglects or refuses so to do, if such wrongful act be committed on, before and after March 5, 2009 pursuant to the March 5, 2009 Document and



or Tay Tay Terror Attack, shall be liable to Tay for all damages caused by such wrongful act, which such person by reasonable diligence could have prevented.

714. As a result, Tay suffers injuries from the actions to prevent neglect and is entitled to relief.

**COUNT 23 - 42 USC § 1986  
(ACTION FOR NEGLIGENCE TO PREVENT)**

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**

715. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

716. The above is applicable to this court by application of Article VI of the U.S.C. "...federal courts, have a constitutional obligation to safeguard personal liberties and to uphold federal law."

717. The Defendants had knowledge that the wrongs conspired to be done are about to be committed in the *United States Private Tutoring Scheme*, and having power to prevent or aid in preventing the commission of the same, neglects or refuses so to do, if such wrongful act be committed on, before and after March 5, 2009 pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack, shall be liable to Tay for all damages caused by such wrongful act, which such person by reasonable diligence could have prevented.

718. As a result, Tay suffers injuries from the actions to prevent neglect and is entitled to relief.

**COUNT 24 - 42 USC § 1986  
(ACTION FOR NEGLIGENCE TO PREVENT)**

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**





719. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

720. The above is applicable to this court by application of Article VI of the U.S.C. "... federal courts, have a constitutional obligation to safeguard personal liberties and to uphold federal law."

721. The Defendants had knowledge that the wrongs conspired to be done are about to be committed in the *Florida Illegal Gambling Scheme*, and having power to prevent or aid in preventing the commission of the same, neglects or refuses so to do, if such wrongful act be committed on, before and after March 5, 2009 pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack, shall be liable to Tay for all damages caused by such wrongful act, which such person by reasonable diligence could have prevented.

722. As a result, Tay suffers injuries from the actions to prevent neglect and is entitled to relief.

**COUNT 25 - 42 USC § 1986  
(ACTION FOR NEGLIGENCE TO PREVENT)**

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**

723. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits Substance prevails over form.

724. The above is applicable to this court by application of Article VI of the U.S.C. "... federal courts, have a constitutional obligation to safeguard personal liberties and to uphold federal law."

725. The Defendants had knowledge that the wrongs conspired to be done are about to be committed in the *Food Stamp Scheme*, and having power to prevent or aid in preventing the



commission of the same, neglects or refuses so to do, if such wrongful act be committed on, before and after March 5, 2009 pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack, shall be liable to Tay for all damages caused by such wrongful act, which such person by reasonable diligence could have prevented.

726. As a result, Tay suffers injuries from the actions to prevent neglect and is entitled to relief.

**COUNT 26 - 42 USC § 1986  
(ACTION FOR NEGLIGENCE TO PREVENT)**

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**

727. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits.

728. The above is applicable to this court by application of Article VI of the U.S.C. "... federal courts, have a constitutional obligation to safeguard personal liberties and to uphold federal law."

729. The Defendants had knowledge that the wrongs conspired to be done are about to be committed in the *Marijuana Discrimination Scheme*, and having power to prevent or aid in preventing the commission of the same, neglects or refuses so to do, if such wrongful act be committed on, before and after March 5, 2009 pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack, shall be liable to Tay for all damages caused by such wrongful act, which such person by reasonable diligence could have prevented.

730. As a result, Tay suffers injuries from the actions to prevent neglect and is entitled to relief.

**COUNT 27 - 42 USC § 1986  
(ACTION FOR NEGLIGENCE TO PREVENT)**

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**



731. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

732. The above is applicable to this court by application of Article VI of the U.S.C. "... federal courts, have a constitutional obligation to safeguard personal liberties and to uphold federal law."

733. The Defendants had knowledge that the wrongs conspired to be done are about to be committed in the *Delayed Justice Scheme*, and having power to prevent or aid in preventing the commission of the same, neglects or refuses so to do, if such wrongful act be committed on, before and after March 5, 2009 pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack, shall be liable to Tay for all damages caused by such wrongful act, which such person by reasonable diligence could have prevented.

734. As a result, Tay suffers injuries from the actions to prevent neglect and is entitled to relief.

**COUNT 28 - 42 USC § 1986  
(ACTION FOR NEGLIGENCE TO PREVENT)**

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**

735. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this



claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

736. The above is applicable to this court by application of Article VI of the U.S.C. "... federal courts, have a constitutional obligation to safeguard personal liberties and to uphold federal law."

737. The Defendants had knowledge that the wrongs conspired to be done are about to be committed in the *Defamation Scheme*, and having power to prevent or aid in preventing the commission of the same, neglects or refuses so to do, if such wrongful act be committed on, before and after March 5, 2009 pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack, shall be liable to Tay for all damages caused by such wrongful act, which such person by reasonable diligence could have prevented.

738. As a result, Tay suffers injuries from the actions to prevent neglect and is entitled to relief.

**COUNT 30 - DECEPTIVE ADVERTISING**

**Pursuant to 15 U.S.C. s 112. (a) s 43(a) LANHAM ACT**

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**

739. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.



740. The Defendants and or RICO Defendants deceptive advertisements pursuant to Tay obtaining his Self Made American Dream and the defaming of Tay's Name and Likeness pursuant to the *Defamation Scheme* which were published throughout the State, wires, the internet and other states, and were thereby placed into interstate commerce which injured, and is likely to continue to injure, Tay.

741. The deceptive advertisement violates Section 43(a) of the Lanham Act, codified at 15 U.S.C. § 1125(a), which prohibits Defendants from using false, misleading, or disparaging representations of fact that misrepresent the nature, characteristics, or qualities of its own or Tay's products (Name and Likeness) on, before and after February 9, 2009 pursuant to the March 5, 2009 Document. As a result of the deceptive advertising, Tay suffers damages. Tay is entitled to relief pursuant to 15 USC § 1117.

**COUNT 31 - OBSTRUCTION OF JUSTICE IN CRIMINAL INVESTIGATIONS OF  
HEALTH CARE OFFENSES**

**(In violation of Title 18 USC § 1505 and Title 18 USC § 1514A(c))**

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**

742. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

743. The Defendants and or RICO Defendants knowingly made a false statement or false statements about Tay's Name and Likeness to the public relating to a fraudulent drug test concerning marijuana. Defendants and or RICO Defendants knowingly submitted or invited



reliance on a sample, specimen, or other object that is misleading in a material respect; or knowingly using a trick, scheme, or device with intent to mislead [Tay Tay Terror Attack] Tay and the public on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the Tay Tay Terror Attack.

744. Tay affirms he were “directly and proximately harmed” by the Defendants and or RICO Defendants as shown in *supra* the Complaint with the attached documents, and other documents through discovery and disclosure in official proceedings with misleading conduct from the Defendants and or RICO Defendants. Tay is entitled relief pursuant to Title 18 USC 1514A(c).

**COUNT 32 – TREASON**

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**

745. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

746. Pursuant to 18 USC § 2381 (“Treason”) the Defendants and or RICO Defendants owes allegiance to the United States and levied war against Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or exclusively the *MSN Hotmail Scheme* and the *NSA Scheme* by giving Defendants and or RICO Defendants aid and comfort within the United States or elsewhere to cause harm to Tay.



747. Defendants and or RICO Defendants breached their Oath or Oath's intentionally to mislead, deceive and harm Tay through the [Tay Tay Terror Attack].

748. Defendants and or RICO Defendants are liable for their acts of intentional fraudulent Oath's pursuant to the Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

749. Tay has been injured and suffers extreme and irreparable harm.

**COUNT 33 –SCHEME BENEFITTING FROM PEONAGE**

**Pursuant to 18 USC § 1593A and 18 USC § 1589(a)(4) under the**

**Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

750. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

751. Defendants and or RICO Defendants forced Tay in poverty and unemployment, while benefitting from the Tay Tay Terror Attack to place and or return Tay to peonage on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack. Tay suffers damages from the scheme and peonage and therefore is entitled to relief under 18 USC § 1595(a).

752. Wherefore Defendants and or RICO Defendants knowingly destroyed, concealed, removed, confiscated and or possesses or possessed Tay's drug test or his Florida Chain of Custody form from February 23, 2009, and or his Equal Employment Opportunity and or his Self Made American Dream on, before and after February 9, 2009 pursuant to the March 5,



2009 Document in the course of a violation(s) of 18 USC §§ 1581, 1584, 1589, 1590 and or 1594(a) and or with intent to violate 18 USC §§ 1581, 1584, 1589 and 1590 and or to prevent or restrict and or attempt to prevent and or restrict, without lawful authority, Tay's liberty to move and or travel on, before and after February 9, 2009 pursuant to the March 5, 2009 Document, when Tay is or has been a victim of a severe form of trafficking, as defined in § 103 of the Trafficking Victims Protection Act of 2000 pursuant to and in violation of 18 USC § 1592. Pursuant to 18 USC § 1592(b) this and or any other section, code and or administrative law applies to Tay due to the misleading and slavery conduct caused by, and or incident to the herein trafficking of Tay.

753. Therefore, holding and or returning Tay to a condition of peonage, and or attempts to arrests Tay with the intent of placing him in or returning him to a condition of peonage in violation of and pursuant to 18 USC § 1581 ("Peonage").

754. Therefore knowingly benefits, financially and or by receiving anything of value, such as Tay's Data Info, from participation in the Tay Tay Terror Attack which has engaged in any act in violation of 18 USC §1581(a) and or 1592 and or 1595(a), knowing and or in reckless disregard of the fact that the Tay Tay Terror Attack has engaged in such violation(s) pursuant to 18 USC § 1593A on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

755. Tay is hereinafter a victim of severe forms of trafficking and or a victim of trafficking pursuant to the Trafficking Victims Protection Act of 2000 § 103(13) and (14) through an act of war as declared on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack in the course of Defendants and or RICO Defendants violation(s) of 18 USC §§ 1581, 1584, 1589, 1590 and or 1594(a) and or with





intent to violate 18 USC §§ 1581, 1584, 1589 and 1590 on, before and after February 9, 2009.

**COUNT 34 - SCHEME BENEFITTING FROM PEONAGE**  
**Pursuant to 18 USC § 1593A and 18 USC § 1589(a)(4) under the**  
**Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

756. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

757. The ultimate goal of this “nefarious scheme” (psychology of deceit) – was for Defendants individually, jointly, socially and materially to engineer a consensual environment that facilitates the easier exploitation and suppression of Tay’s Name and Likeness by engendering a shift of victimization that changes the root problem of racism in America to be due to his alleged behavior rather than the corporate and public officers proclivity for racism and exclusive prejudice on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

758. Defendants benefitted from the RICO Defendants K-20 education curriculum to place and or return Tay to peonage on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack. Tay suffers damages from the scheme and peonage and therefore is entitled to relief.



759. Defendants and or RICO Defendants forced Tay in poverty and unemployment, while benefitting from the Tay Tay Terror Attack to place and or return Tay to peonage on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack. Tay suffers damages from the scheme and peonage and therefore is entitled to relief under 18 USC § 1595(a).

760. Wherefore Defendants and or RICO Defendants knowingly destroyed, concealed, removed, confiscated and or possesses or possessed Tay's drug test or his Florida Chain of Custody form from February 23, 2009, and or his Equal Employment Opportunity and or his Self Made American Dream on, before and after February 9, 2009 pursuant to the March 5, 2009 Document in the course of a violation(s) of 18 USC §§ 1581, 1584, 1589, 1590 and or 1594(a) and or with intent to violate 18 USC §§ 1581, 1584, 1589 and 1590 and or to prevent or restrict and or attempt to prevent and or restrict, without lawful authority, Tay's liberty to move and or travel on, before and after February 9, 2009 pursuant to the March 5, 2009 Document, when Tay is or has been a victim of a severe form of trafficking, as defined in § 103 of the Trafficking Victims Protection Act of 2000 pursuant to and in violation of 18 USC § 1592. Pursuant to 18 USC § 1592(b) this and or any other section, code and or administrative law applies to Tay due to the misleading and slavery conduct caused by, and or incident to the herein trafficking of Tay.

761. Therefore, holding and or returning Tay to a condition of peonage, and or attempts to arrests Tay with the intent of placing him in or returning him to a condition of peonage in violation of and pursuant to 18 USC § 1581 ("Peonage") on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.



762. Therefore knowingly benefits, financially and or by receiving anything of value, such as Tay's Data Info, from participation in the Tay Tay Terror Attack which has engaged in any act in violation of 18 USC §1581(a) and or 1592 and or 1595(a), knowing and or in reckless disregard of the fact that the Tay Tay Terror Attack has engaged in such violation(s) pursuant to 18 USC § 1593A on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

763. Tay is hereinafter a victim of severe forms of trafficking and or a victim of trafficking pursuant to the Trafficking Victims Protection Act of 2000 § 103(13) and (14) through an act of war as declared on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack in the course of Defendants and or RICO Defendants violation(s) of 18 USC §§ 1581, 1584, 1589, 1590 and or 1594(a) and or with intent to violate 18 USC §§ 1581, 1584, 1589 and 1590 on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

**COUNT 35 - SCHEME BENEFITTING FROM PEONAGE**  
**Pursuant to 18 USC § 1593A and 18 USC § 1589(a)(4) under the**  
**Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

764. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.



765. Defendants forced Tay into the State's education curriculum harboring him Cocoa, FL and are benefitting from the RICO Defendants K-12 student athlete curriculum pursuant to the herein *K - 20 Education Surveillance* to place and or return Tay to peonage on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack. Tay suffers damages from the scheme and peonage and therefore is entitled to relief.

766. Defendants and or RICO Defendants forced Tay in poverty and unemployment, while benefitting from the Tay Tay Terror Attack to place and or return Tay to peonage on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack. Tay suffers damages from the scheme and peonage and therefore is entitled to relief under 18 USC § 1595(a).

767. Wherefore Defendants and or RICO Defendants knowingly destroyed, concealed, removed, confiscated and or possesses or possessed Tay's drug test or his Florida Chain of Custody form from February 23, 2009, and or his Equal Employment Opportunity and or his Self Made American Dream on, before and after February 9, 2009 pursuant to the March 5, 2009 Document in the course of a violation(s) of 18 USC §§ 1581, 1584, 1589, 1590 and or 1594(a) and or with intent to violate 18 USC §§ 1581, 1584, 1589 and 1590 and or to prevent or restrict and or attempt to prevent and or restrict, without lawful authority, Tay's liberty to move and or travel on, before and after February 9, 2009 pursuant to the March 5, 2009 Document, when Tay is or has been a victim of a severe form of trafficking, as defined in § 103 of the Trafficking Victims Protection Act of 2000 pursuant to and in violation of 18 USC § 1592. Pursuant to 18 USC § 1592(b) this and or any other section, code and or administrative law applies to Tay due to the misleading and slavery conduct caused by, and or incident to the herein trafficking of Tay.



768. Therefore, holding and or returning Tay to a condition of peonage, and or attempts to arrests Tay with the intent of placing him in or returning him to a condition of peonage in violation of and pursuant to 18 USC § 1581 (“Peonage”) on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

769. Therefore knowingly benefits, financially and or by receiving anything of value, such as Tay’s Data Info, from participation in the Tay Tay Terror Attack which has engaged in any act in violation of 18 USC §1581(a) and or 1592 and or 1595(a), knowing and or in reckless disregard of the fact that the Tay Tay Terror Attack has engaged in such violation(s) pursuant to 18 USC § 1593A on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

770. Tay is hereinafter a victim of severe forms of trafficking and or a victim of trafficking pursuant to the Trafficking Victims Protection Act of 2000 § 103(13) and (14) through an act of war as declared on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack in the course of Defendants and or RICO Defendants violation(s) of 18 USC §§ 1581, 1584, 1589, 1590 and or 1594(a) and or with intent to violate 18 USC §§ 1581, 1584, 1589 and 1590 on, before and after February 9, 2009.

**COUNT 36 - SCHEME BENEFITTING FROM PEONAGE**  
**Pursuant to 18 USC § 1593A and 18 USC § 1589(a)(4) under the**  
**Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

771. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this



claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

772. Defendants and or RICO Defendants forced Tay to become a First Time At Risk College Student at FAMU and are benefitting from the Defendants and or RICO Defendants First Time At Risk College Student scheme on, before and after February 9, 2009 to place and or return Tay to poverty on, before and after March 5, 2009 pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack. Tay suffers damages from the scheme and peonage and therefore is entitled to relief under 18 USC § 1595(a).

773. Defendants and or RICO Defendants forced Tay in poverty and unemployment, while benefitting from the Tay Tay Terror Attack to place and or return Tay to peonage on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack. Tay suffers damages from the scheme and peonage and therefore is entitled to relief under 18 USC § 1595(a).

774. Wherefore Defendants and or RICO Defendants knowingly destroyed, concealed, removed, confiscated and or possesses or possessed Tay's drug test or his Florida Chain of Custody form from February 23, 2009, and or his Equal Employment Opportunity and or his Self Made American Dream on, before and after February 9, 2009 pursuant to the March 5, 2009 Document in the course of a violation(s) of 18 USC §§ 1581, 1584, 1589, 1590 and or 1594(a) and or with intent to violate 18 USC §§ 1581, 1584, 1589 and 1590 and or to prevent or restrict and or attempt to prevent and or restrict, without lawful authority, Tay's liberty to move and or travel on, before and after February 9, 2009 pursuant to the March 5, 2009 Document, when Tay is or has been a victim of a severe form of trafficking, as defined in §



103 of the Trafficking Victims Protection Act of 2000 pursuant to and in violation of 18 USC § 1592. Pursuant to 18 USC § 1592(b) this and or any other section, code and or administrative law applies to Tay due to the misleading and slavery conduct caused by, and or incident to the herein trafficking of Tay.

775. Therefore, holding and or returning Tay to a condition of peonage, and or attempts to arrests Tay with the intent of placing him in or returning him to a condition of peonage in violation of and pursuant to 18 USC § 1581 ("Peonage").

776. Therefore knowingly benefits, financially and or by receiving anything of value, such as Tay's Data Info, from participation in the Tay Tay Terror Attack which has engaged in any act in violation of 18 USC §1581(a) and or 1592 and or 1595(a), knowing and or in reckless disregard of the fact that the Tay Tay Terror Attack has engaged in such violation(s) pursuant to 18 USC § 1593A on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

777. Tay is hereinafter a victim of severe forms of trafficking and or a victim of trafficking pursuant to the Trafficking Victims Protection Act of 2000 § 103(13) and (14) through an act of war as declared on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack in the course of Defendants and or RICO Defendants violation(s) of 18 USC §§ 1581, 1584, 1589, 1590 and or 1594(a) and or with intent to violate 18 USC §§ 1581, 1584, 1589 and 1590 on, before and after February 9, 2009.

**COUNT 37 - SCHEME BENEFITTING FROM PEONAGE**  
**Pursuant to 18 USC § 1593A and 18 USC § 1589(a)(4) under the**  
**Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**



778. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in these claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

779. Defendants are benefitting from the RICO Defendants Entrepreneurship scheme to place and or return Tay to peonage on, before and after March 5, 2009 pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack. Tay suffers damages from the scheme and peonage and therefore is entitled to relief.

780. Defendants and or RICO Defendants forced Tay in poverty and unemployment, while benefitting from the Tay Tay Terror Attack to place and or return Tay to peonage on, before and after March 5, 2009 pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack. Tay suffers damages from the scheme and peonage and therefore is entitled to relief under 18 USC § 1595(a).

781. Wherefore Defendants and or RICO Defendants knowingly destroyed, concealed, removed, confiscated and or possesses or possessed Tay's drug test or his Florida Chain of Custody form from February 23, 2009, and or his Equal Employment Opportunity and or his Self Made American Dream on, before and after February 9, 2009 pursuant to the March 5, 2009 Document in the course of a violation(s) of 18 USC §§ 1581, 1584, 1589, 1590 and or 1594(a) and or with intent to violate 18 USC §§ 1581, 1584, 1589 and 1590 and or to prevent or restrict and or attempt to prevent and or restrict, without lawful authority, Tay's liberty to





move and or travel on, before and after February 9, 2009 pursuant to the March 5, 2009 Document, when Tay is or has been a victim of a severe form of trafficking, as defined in § 103 of the Trafficking Victims Protection Act of 2000 pursuant to and in violation of 18 USC § 1592. Pursuant to 18 USC § 1592(b) this and or any other section, code and or administrative law applies to Tay due to the misleading and slavery conduct caused by, and or incident to the herein trafficking of Tay.

782. Therefore, holding and or returning Tay to a condition of peonage, and or attempts to arrests Tay with the intent of placing him in or returning him to a condition of peonage in violation of and pursuant to 18 USC § 1581 (“Peonage”).

783. Therefore knowingly benefits, financially and or by receiving anything of value, such as Tay’s Data Info, from participation in the Tay Tay Terror Attack which has engaged in any act in violation of 18 USC §1581(a) and or 1592 and or 1595(a), knowing and or in reckless disregard of the fact that the Tay Tay Terror Attack has engaged in such violation(s) pursuant to 18 USC § 1593A on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

784. Tay is hereinafter a victim of severe forms of trafficking and or a victim of trafficking pursuant to the Trafficking Victims Protection Act of 2000 § 103(13) and (14) through an act of war as declared on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack in the course of Defendants and or RICO Defendants violation(s) of 18 USC §§ 1581, 1584, 1589, 1590 and or 1594(a) and or with intent to violate 18 USC §§ 1581, 1584, 1589 and 1590 on, before and after February 9, 2009.

**COUNT 38 - SCHEME BENEFITTING FROM PEONAGE**



**Pursuant to 18 USC § 1593A and 18 USC § 1589(a)(4) under the  
Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

785. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in these claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

786. Defendants forced Tay to attempt and or apply for employment while benefitting from the Defendants Employment scheme to place and or return Tay to peonage on, before and after March 5, 2009 pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack. Tay suffers damages from the scheme and peonage and therefore is entitled to relief.

787. Defendants and or RICO Defendants forced Tay in poverty and unemployment, while benefitting from the Tay Tay Terror Attack to place and or return Tay to peonage on, before and after March 5, 2009 pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack. Tay suffers damages from the scheme and peonage and therefore is entitled to relief under 18 USC § 1595(a).

788. Wherefore Defendants and or RICO Defendants knowingly destroyed, concealed, removed, confiscated and or possesses or possessed Tay's drug test or his Florida Chain of Custody form from February 23, 2009, and or his Equal Employment Opportunity and or his Self Made American Dream on, before and after February 9, 2009 pursuant to the March 5, 2009 Document in the course of a violation(s) of 18 USC §§ 1581, 1584, 1589, 1590 and or 1594(a) and or with intent to violate 18 USC §§ 1581, 1584, 1589 and 1590 and or to prevent



or restrict and or attempt to prevent and or restrict, without lawful authority, Tay's liberty to move and or travel on, before and after February 9, 2009 pursuant to the March 5, 2009 Document, when Tay is or has been a victim of a severe form of trafficking, as defined in § 103 of the Trafficking Victims Protection Act of 2000 pursuant to and in violation of 18 USC § 1592. Pursuant to 18 USC § 1592(b) this and or any other section, code and or administrative law applies to Tay due to the misleading and slavery conduct caused by, and or incident to the herein trafficking of Tay.

789. Therefore, holding and or returning Tay to a condition of peonage, and or attempts to arrests Tay with the intent of placing him in or returning him to a condition of peonage in violation of and pursuant to 18 USC § 1581 ("Peonage").

790. Therefore knowingly benefits, financially and or by receiving anything of value, such as Tay's Data Info, from participation in the Tay Tay Terror Attack which has engaged in any act in violation of 18 USC §1581(a) and or 1592 and or 1595(a), knowing and or in reckless disregard of the fact that the Tay Tay Terror Attack has engaged in such violation(s) pursuant to 18 USC § 1593A on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

791. Tay is hereinafter a victim of severe forms of trafficking and or a victim of trafficking pursuant to the Trafficking Victims Protection Act of 2000 § 103(13) and (14) through an act of war as declared on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack in the course of Defendants and or RICO Defendants violation(s) of 18 USC §§ 1581, 1584, 1589, 1590 and or 1594(a) and or with intent to violate 18 USC §§ 1581, 1584, 1589 and 1590 on, before and after February 9, 2009.



**COUNT 39 - SCHEME BENEFITTING FROM PEONAGE**  
**Pursuant to 18 USC § 1593A and 18 USC § 1589(a)(4) under the**  
**Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

792. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in these claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.
793. Defendants are benefitting from the herein *Obama's Path to Presidency* scheme to place and or return Tay to peonage on, before and after March 5, 2009 pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack. Tay suffers damages from the scheme and peonage and therefore is entitled to relief.
794. Defendants and or RICO Defendants forced Tay in poverty and unemployment, while benefitting from the Tay Tay Terror Attack to place and or return Tay to peonage on, before and after March 5, 2009 pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack. Tay suffers damages from the scheme and peonage and therefore is entitled to relief under 18 USC § 1595(a).
795. Wherefore Defendants and or RICO Defendants knowingly destroyed, concealed, removed, confiscated and or possesses or possessed Tay's drug test or his Florida Chain of Custody form from February 23, 2009, and or his Equal Employment Opportunity and or his Self Made American Dream on, before and after February 9, 2009 pursuant to the March 5, 2009 Document in the course of a violation(s) of 18 USC §§ 1581, 1584, 1589, 1590 and or



1594(a) and or with intent to violate 18 USC §§ 1581, 1584, 1589 and 1590 and or to prevent or restrict and or attempt to prevent and or restrict, without lawful authority, Tay's liberty to move and or travel on, before and after February 9, 2009 pursuant to the March 5, 2009 Document, when Tay is or has been a victim of a severe form of trafficking, as defined in § 103 of the Trafficking Victims Protection Act of 2000 pursuant to and in violation of 18 USC § 1592. Pursuant to 18 USC § 1592(b) this and or any other section, code and or administrative law applies to Tay due to the misleading and slavery conduct caused by, and or incident to the herein trafficking of Tay.

796. Therefore, holding and or returning Tay to a condition of peonage, and or attempts to arrests Tay with the intent of placing him in or returning him to a condition of peonage in violation of and pursuant to 18 USC § 1581 ("Peonage").

797. Therefore knowingly benefits, financially and or by receiving anything of value, such as Tay's Data Info, from participation in the Tay Tay Terror Attack which has engaged in any act in violation of 18 USC §1581(a) and or 1592 and or 1595(a), knowing and or in reckless disregard of the fact that the Tay Tay Terror Attack has engaged in such violation(s) pursuant to 18 USC § 1593A on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

798. Tay is hereinafter a victim of severe forms of trafficking and or a victim of trafficking pursuant to the Trafficking Victims Protection Act of 2000 § 103(13) and (14) through an act of war as declared on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack in the course of Defendants and or RICO Defendants violation(s) of 18 USC §§ 1581, 1584, 1589, 1590 and or 1594(a) and or with



intent to violate 18 USC §§ 1581, 1584, 1589 and 1590 on, before and after February 9, 2009.

**COUNT 40 - SCHEME BENEFITTING FROM PEONAGE**

**Pursuant to 18 USC § 1593A and 18 USC § 1589(a)(4) under the**

**Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

799. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

800. Tay alleges that the Defendants individually, jointly, socially and materially was the Mastermind of the nefarious ganja scheme against Tay; to have Tay rely on God (“In God We Trust”), pop culture, movies and music, marijuana, sports, money, politics, tour and travel and adultery to deceive him with those representations of The Devil on, before and after February 9, 2009 pursuant to the March 5, 2009 Document; to be the ‘*root*’ of all evil and deprive him of his life because he has created his own culture (the “Tay Tay Chocolate City – Clean, Charismatic, Common - Culture” *Tay Tay Triple C’s*) and were on the verge of escaping ‘*The Trap*’ in Cocoa.

801. Defendants are benefitting from the Defendants Marijuana scheme to place and or return Tay to peonage on, before and after March 5, 2009 pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack. Tay suffers damages from the scheme and peonage and therefore is entitled to relief.



802. Defendants and or RICO Defendants forced Tay in poverty and unemployment, while benefitting from the Tay Tay Terror Attack to place and or return Tay to peonage on, before and after March 5, 2009 pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack. Tay suffers damages from the scheme and peonage and therefore is entitled to relief under 18 USC § 1595(a).

803. Wherefore Defendants and or RICO Defendants knowingly destroyed, concealed, removed, confiscated and or possesses or possessed Tay's drug test or his Florida Chain of Custody form from February 23, 2009, and or his Equal Employment Opportunity and or his Self Made American Dream on, before and after February 9, 2009 pursuant to the March 5, 2009 Document in the course of a violation(s) of 18 USC §§ 1581, 1584, 1589, 1590 and or 1594(a) and or with intent to violate 18 USC §§ 1581, 1584, 1589 and 1590 and or to prevent or restrict and or attempt to prevent and or restrict, without lawful authority, Tay's liberty to move and or travel on, before and after February 9, 2009 pursuant to the March 5, 2009 Document, when Tay is or has been a victim of a severe form of trafficking, as defined in § 103 of the Trafficking Victims Protection Act of 2000 pursuant to and in violation of 18 USC § 1592. Pursuant to 18 USC § 1592(b) this and or any other section, code and or administrative law applies to Tay due to the misleading and slavery conduct caused by, and or incident to the herein trafficking of Tay.

804. Therefore, holding and or returning Tay to a condition of peonage, and or attempts to arrests Tay with the intent of placing him in or returning him to a condition of peonage in violation of and pursuant to 18 USC § 1581 ("Peonage").

805. Therefore knowingly benefits, financially and or by receiving anything of value, such as Tay's Data Info, from participation in the Tay Tay Terror Attack which has engaged in any



act in violation of 18 USC §1581(a) and or 1592 and or 1595(a), knowing and or in reckless disregard of the fact that the Tay Tay Terror Attack has engaged in such violation(s) pursuant to 18 USC § 1593A on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

806. Tay is hereinafter a victim of severe forms of trafficking and or a victim of trafficking pursuant to the Trafficking Victims Protection Act of 2000 § 103(13) and (14) through an act of war as declared on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack in the course of Defendants and or RICO Defendants violation(s) of 18 USC §§ 1581, 1584, 1589, 1590 and or 1594(a) and or with intent to violate 18 USC §§ 1581, 1584, 1589 and 1590 on, before and after February 9, 2009.

**COUNT 41 – 42 USC § 1983**

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**

807. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

808. Obama subjects, or causes to be subjected, Tay within the jurisdiction thereof, deprived Tay the right to a government free from corruption, fraud and dishonesty pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack pursuant to the March 5, 2009





Document and or the Tay Tay Terror Attack. As a result of the deprivation, Tay suffers extreme and irreparable harm and is entitled to relief under the titled section [1983].

**COUNT 42 – TREASON**

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**

809. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

810. The Defendant owes allegiance to the United States and levied war against Tay on, before and after February 9, 2009 including but not limited to the Tay Tay Terror Attack by giving Defendants aid and comfort within the United States or elsewhere to cause harm to Tay pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack.

811. Defendants breached their Oath or Oath's intentionally to mislead, deceive and harm Tay through Tay Tay Terror Attacks [Tay Tay Terror Attack].

812. All Defendants are liable for their acts of intentional fraudulent Oath's within the Tay Tay Terror Attacks pursuant to the Tay Tay Terror Attack.

813. The Defendants acts of treason caused Tay severe and extreme damages. Tay has been injured and suffers extreme and irreparable harm

814. Tay seeks damages pursuant to 42 USC § 1983.

**COUNT 43 – ESPIONAGE**



**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**

815. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

816. Defendants are in concert of this action as defined in 10 USC § 881-Art. 81 (Conspiracy) pursuant to the herein the Tay Tay Terror Attack.

817. As defined in 10 USC § 906a – Art. 106a(a)(1)(A)(B)(C)(D) (Espionage) Any person subject to this chapter who, with intent or reason to believe that it is to be used to the injury of the United States or to the advantage of a foreign nation, communicates, delivers, or transmits, or attempts to communicate, deliver, or transmit, to any entity.

818. Defendants statements within the [Tay Tay Terror Attack] were false and are in violation to 10 USC § 907 – Art. 107 (False official statements).

819. In violation of 18 USC § 1831 (Economic Espionage) and § 1832 (Theft or Trade Secrets) Defendants with intent to convert a trade secret, that is related to a product or service used in or intended for use in interstate or foreign commerce, to the economic benefit of anyone other than Tay, the owner thereof, and intending or knowing that the offense will, injure any owner of that trade secret, knowingly intended or knew that the offense will benefit any foreign government, foreign instrumentality, or foreign agent, knowingly stole, or without authorization appropriates, took, carried away, or concealed, or



by fraud, artifice, or deception obtains a trade secret; without authorization copies, duplicates, sketches, draws, photographs, downloads, uploads, alters, destroys, photocopies, replicates, transmits, delivers, sends, mails, communicates, or conveys a trade secret; receives, buys, or possesses a trade secret, knowing the same to have been stolen or appropriated, obtained, or converted without authorization.

820. Defendants violated 18 USC § 793(a)(d) (Gathering, transmitting, or losing Defense Information) and 18 USC § 798(a)(3), §794 (Gathering or delivering defense information to aid foreign governments), in conspiracy (42 §USC 1985(3)) agreeing with NASA in violation of 18 USC § 799 pursuant to the March 5, 2009 Document within the Tay Tay Terror Attack against Tay.

821. Tay suffers injuries from this claim and therefore as a result of his injuries, Tay seeks \$20 million in monetary reward for the violations of the herein actions pursuant to 18 USC § 2520 or 18 USC § 3071(b).

#### **COUNT 44 – CONSPIRACY**

Pursuant to 18 USC § 371 (Conspiracy to commit offense to defraud United States)

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**

822. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

823. Defendants conspired to defraud the United States, or any agency thereof in the manner of acts within the Tay Tay Terror Attack for the purpose of trafficking Tay, benefitting from



his human capitol and contract agreements, and conspiring to place or return Tay to poverty on, before and after February 9, 2009, wherefore the March 5, 2009 Document and illegal acts, herein Complaint, to effect the object of the conspiracy.

824. As a result of the harm done to Tay, he suffers damages. Tay in entitled to relief pursuant to 42 USC § 1983.

**COUNT 45 - INVIDIOUS DISCRIMINATORY ANIMUS:  
THE DISPARATE IMPACT<sup>182</sup>**

**Pursuant to 42 U.S.C. § 1985(1)<sup>183</sup>**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

561. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

562. In denying Tay his **DATES RIGHTS** pursuant to the Delayed Justice Scheme pursuant to the April Fool's Order to discovery, according to a facially neutral scheme, the violation discriminated -- by its disparate impact -- against Tay because of his race, color and gender;

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<sup>182</sup> In *Aulson v. Blanchard*, 83 F.3d 1, 4 (1996), Judge Selya wrote:

In all events, an unforced reading of Section(s) 1985(3) affords no principled basis for distinguishing between public and private conspiracies. *Griffin [v. Breckenridge]*, 403 U.S. 88, 102 (1971)] neither supports nor suggests the existence of such a distinction, and, at any rate, it is not the proper province of a federal court to rewrite a statute under the guise of interpretation. Thus, we decline the plaintiff's invitation to create by judicial fiat two classes of Section(s) 1985(3) conspiracies along a public/private axis. The problem with that court's conclusion is that it was inherently inconsistent with what it had written earlier in the same opinion, to wit, that the Supreme Court in *Griffin*, "under the guise of interpret[ing 1985(3)]" [*Aulson*, at 4], had already "placed a gloss on these four elements, effectively adding a fifth requirement." *Aulson*, at 3. That fifth requirement: that "the conspiratorial conduct of which [the plaintiff] complains [must be] propelled by 'some racial, or perhaps otherwise class-based, invidiously discriminatory animus.'" *Id.* at 3, quoting *Griffin*, at 102.

<sup>183</sup> See <http://digitalcommons.law.wustl.edu/cgi/viewcontent.cgi?article=2321&context=lawreview>.



a NIGGA, and he was thereby deprived, indirectly or directly, of the equal protection of the laws, injured in his person and property and deprived of having and exercising rights and privileges of a citizen of the United States.

563. Tay is a member of the black male class who suffer from a class-based invidiously discriminatory animus in today's society.

564. Another example of the invidiously discriminatory animus is the cessation of discovery by any and all judges, including but not limited to Judge Presnell since April 1, 2010.

565. Had Tay been a white female, he would have been able to get discovery, but Tay was a black male, so he lost his DATES RIGHTS, and rights to discovery.

566. Tay was harmed, was caused to incur considerable debt for legal services, and has been suffering from anxiety, feelings of hopelessness, loss of trust, loss of confidence in and feelings of betrayal by the justice system, shock, and emotional scarring, all compensable as emotional distress, and other damages and are entitled to relief.

#### **COUNT 46 - COMMON LAW CONSPIRACY**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

567. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.



568. In furtherance of their object, Tay, Defendants did two or more overt acts against Tay's Exclusive Name and Likeness and Property. Those unlawful overt acts include, but are not limited to; the facts pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack, *supra* the Complaint, conspiracy under section 1985(3).

569. All defendants are liable for their acts.

570. Tay has been injured and suffers extreme and irreparable harm, and is entitled to relief.

**COUNT 47 - FRAUD BY OMISSION OR NONDISCLOSURE**

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**

571. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

572. Medical records and an offer of judgment are not to be lightly disregarded: each party must sign the Statement under the pains and penalties of perjury and each party's attorney must countersign in order to vouch for the truthfulness of the attorney's client and the accuracy of the financial information supplied by the client pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack.



573. As a result of this dual signing requirement, trust between the parties and between each of the parties and the other spouse's attorney is encouraged, fostered, and implied<sup>184</sup> by the process.

574. When the School Board and the State and all of their attorneys respectively signed and countersigned the Florida Chain of Custody form, his rejection for employment as a substitute teacher and Financial Insurance Statements which they all knew to be neither true nor accurate, and then overzealously opposed Tay getting access to due process and equal protection which would prove both their knowledge and intentional misrepresentations, they were attempting to defraud Tay by nondisclosure.

575. In addition, the repeated misrepresentations caused Tay additional legal expenses that were reasonably foreseeable as a possible result of the Defendants intentional acts.<sup>185</sup>

576. The Defendants is responsible not only for their outright untrue written statements, but also for untruthfully declaring that Tay is unqualified to teach in Brevard Public Schools.<sup>186</sup>

577. Tay was harmed and has been caused to incur considerable legal expenses in order to get the escape slavery, and has been suffering from anxiety, a feeling of hopelessness, loss of

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<sup>184</sup> See Rood v. Newberg, 48 Mass.App.Ct. 185, 192 (1999).

<sup>185</sup> "Common law fraud can be the basis for a claim of unfair or deceptive practices under the statute [cites omitted], and an intentional fraud can constitute a basis for the **multiplication** of damages." McEvoy Travel Bureau, Inc. v. Norton Co., 408 Mass. 704, 714 (1990), PMP Assocs., Inc. v. Globe Newspaper Co., 366 Mass. 593, 596 (1975); Levings v. Forbes & Wallace, Inc., 8 Mass.App.Ct. 498, 504 (1979). Certain misrepresentations to a plaintiff are actionable under both common law fraud and G.L. c. 93A. Schwanbeck v. Federal-Mogul Corp., 412 Mass. 703, 704-705 (1992) citing Schwanbeck v. Federal-Mogul Corp., 31 Mass.App.Ct. 390, 411-412, 415-416 (1991).

<sup>186</sup> Kozdras v. Land/Vest Properties, Inc., 382 Mass. 34, 41 (1980) (where affiant, familiar with the actual facts, made "affidavit either with intent to defraud the Land Court or with such wilful disregard of the facts as to be tantamount to fraud"). Cf. Zimmerman v. Kent, 31 Mass.App.Ct. 72, 77-78 (1991) (Where the plaintiff proves "a statement made, as of the party's own knowledge, which is false, provided the thing stated is not merely a matter of opinion, estimate, or judgment, but is susceptible of actual knowledge ... it is not necessary to make any further proof of an actual intent to deceive"), quoting Snyder v. Sperry & Hutchinson Co., 368 Mass. 433, 444 (1975), quoting Powell v. Rasmussen, 355 Mass. 117, 118 (1969), in turn quoting Chatham Furnace Co. v. Moffatt, 147 Mass. 403, 404 (1888).



trust, loss of confidence in and feelings of betrayal by the justice system, shock, and emotional scarring, all compensable as emotional distress, and other damages.

**COUNT 48 – CONVERSION**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

578. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

579. On and before February 9, 2009, and continuing to the present, the RICO Defendants has kept Tay's money from the employment hoax that he had participated in at the School Board on February 10, 2009 thru March 5, 2009.

580. Tay values his property, but can't have his property returned to him due to paying for the elements he received in pursuance of an Equal Employment Opportunity with the School Board, and the sweepstakes entries with Allied Veterans.

581. Upon information and belief, the Defendants and or RICO Defendants are using or is intending to use Tay's property against him, and depriving him of the property that would be evidence against the Defendants and or RICO Defendants for violating his rights.

582. The Defendants and or RICO Defendants have committed acts of dominion wrongfully asserted over Tay's property inconsistent with his ownership therein.

583. The Defendants and or RICO Defendants have committed unauthorized acts that deprive Tay of his property permanently and/or for an indefinite time.





584. The Defendants and or RICO Defendants acted with malice or callous indifference to Tay's rights.

585. Tay has been injured by the Defendants and or RICO Defendants as a result of the violations as alleged in this Count, including pain and suffering, emotional distress, mental anguish, loss of the capacity to enjoy life, loss of sense of self-efficacy, and economic damages.

586. Tay should be granted relief pursuant to 42 USC § 1983.

#### **COUNT 49 - INJUNCTIVE RELIEF**

587. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

588. An injunction is an "extraordinary remedy" that should be sparingly granted and that is properly entered "only in certain well-defined circumstances." *Tom v. Russ*, 752 So. 2d 1250, 1251 (Fla. 1st DCA 2000). A party seeking the entry of a preliminary injunction carries the burden of persuasion and must demonstrate: (1) a likelihood of irreparable harm and the unavailability of an adequate remedy at law; (2) a substantial likelihood of success on the merits or a clear, legal right to the requested relief; (3) that the threatened injury to the petitioner outweighs and possible harm to the respondent; and (4) that the granting of a temporary injunction will not disserve the public interest. *See Naegele Outdoor Advertising*



*Co., Inc. v. City of Jacksonville*, 659 So.2d 1046, 1047 (Fla. 1995); *Anich Indus., Inc. v. Raney*, 751 So. 2d 767, 770 (Fla. 5<sup>th</sup> DCA 2000).

589. Tay has a substantial likelihood on the merits because legal actions cited herein clearly prohibit the dissemination of Tay pursuing employment and attempting to better himself.

590. Irreparable harm has, will and continue to occur unless immediate relief is granted because a) Tay will continue to live below the poverty line in Cocoa, FL, b) Tay will not be able to live in a safe, efficient, private, serene, and accommodating lifestyle to work on developing a family, c) Tay will continue to risk his livelihood and freedom by making purchases of an illegal medicinal drug and distributing food stamps for cash under extreme distress, d) Tay will continue to live at his grandmother's home, whom will have to suffer trying to pay for living necessities and no reliable transportation to move and may risk foreclosure on the residence<sup>187</sup>, e) Tay will not be able to make purchases to stimulate the economy and risk a Chapter 13 or Chapter 7 bankruptcy case against him, f) Tay's emotional distress will deepen, g) the public will look at Tay as if he's accomplished nothing, h) he will not be able to enroll in higher education, i) his name and likeness will continue to be damaged, j) Tay cannot reliably travel to find employment, k) Tay will not be able to endorse himself and have a positive image to attract other businesses and or organizations to endorse him as a entrepreneur, to run for Mayor of Cocoa and possibly any political office that he seeks interest in the State of Florida, including Governor and l) Tay will not be able to create businesses and employ citizens with entrepreneurial projects.

591. The threatened injury to Tay outweighs any possible harm to the Defendants.

592. The granting of an injunction will not disserve the public's interest.

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<sup>187</sup> See 2011 case 6:11-cv-731-Orl-18DAB, Id. @ Doc 9. And Doc. 10



593. The public's interest here is public safety and public image. Keeping dangerous people off the streets and preventing them from causing harm to people and property is extremely important, and is also given significant weight in determining a fiduciary duty and what process is due. In times like these; Florida's housing foreclosure crisis, about a 10% statewide unemployment rate, innocent drug addictions, 16.5 % of Florida citizens living below the employment line in 2009 it's in the public's best interest for Tay to live accordingly as a very ambitious citizen in and for the State of Florida. Tay has not and will not harm the public. Tay's requested Rolls Royce and riverfront home will not harm the public<sup>188</sup>. The public will clearly see that Tay has acquired and obtained what he dreamed to obtain through hard work and most importantly the grace of God. Tay is a homeless public figure that has to walk any and everywhere he has to go.

594. As for marijuana, its use has rarely been a public safety issue, if at all<sup>189</sup>. One cannot overdose on it. Law Enforcement officers spend millions of hours searching cars for marijuana. They could instead concentrate on the deadly DUI and reckless drivers. They would be re-directed to find and arrest the child predators online looking for underage children. It's in the public's best interest that Tay lives accordingly and to "*serve*" him a drug and immune him from arrest under these very unique circumstances.

595. To award Tay adequate living relief from Defendant, Microsoft:

- a. An oceanfront residence located at 2120 N. Indian River Dr., Cocoa, FL 32922 from Perrone Properties with paid home insurance for 10 years, and light (FPL), water (City of Cocoa), television and internet (Brighthouse) for 4 years.

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<sup>188</sup> This requested relief is a symbolism of obtaining and acquiring the American Dream, and or being very lucrative in some type of business, rather legal or illegal.

<sup>189</sup> The public of the United States voted to legalize marijuana in about 23 states in the United States. See <http://medicalmarijuana.procon.org/view.resource.php?resourceID=000881>.



b. Sources of transportation including a:

- i. Custom 2014 Rolls Royce Phantom Series II Coupe with paid insurance for 4 years from dealership Ultimate Motors – Rolls Royce Orlando in Orlando, FL.
- ii. 2014 Cadillac Escalade from Mike Erdman Cadillac in Merritt Island, FL;
- iii. 2014 Mini Cooper S Hardtop Coupe from Orlando MINI in Orlando, FL;

c. \$3.65 million monetary relief for each year Tay has been unemployed from March 5, 2009 – present. Approximately \$20.075 million.

596. To award Tay, from each Defendant and RICO Defendant; special and miscellaneous relief pursuant to punitive compensation from each named Defendant, in the amount of **\$50, 500. 27<sup>190</sup>** (approx. about 3.65 years of a full time substitute teacher's salary); **\$29, 700** for unemployment benefits that he could not be eligible to receive due to the deeply rooted scheme for 99 weeks at a rate of \$300/wk to make him ineligible; **\$8, 000** for \$200/month for 4 years receiving and relying on the food stamp and employment programs; **\$26, 200** (\$6500/yr) for the City of Cocoa Mayor's 4 year salary individually and jointly to receive employment in Brevard County; **\$20, 500** for the prequalified FASFA to attend Everest; **\$25k** for the Schenck Foundation Scholarship from 2003 – 2008; the aggregate total of Tay's FAMU education from 2003 – 2008; \$13, 000 for not receiving a 'Big Win' in the Allied Veteran's illegal gambling scheme at the maximum amount of \$6.50 per play from the years 2009 to 2013, with an aggregate total of **\$52, 000.00**; including any and all wages earned and taxes paid from employment with GMRS Marketing, Fed Ex, Cocoa Hyundai, Buffalo Wild Wings, Late Nite Liquors, Ron Jon Cape Caribe Resort, Books A Million and Joseph A. Bank. [hereinafter, "REAL Nigga Labor Fees"]

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<sup>190</sup> See <http://www.nctq.org/admin/ExcelOutput?id=2>; \$8.75 per hour for Substitute teachers with at least a Associate of Arts degree.



597. To award Tay relief from Obama and or Rick Scott:

- i. Full medical insurance from Blue Cross Blue Shield of Florida Group;
- ii. Declaratory relief mandating Obama, the State, it's House and Senate "discharge petitioner to permit a floor debate" to legalize marijuana under the title: "*Tay Tay's Mean To Go Green for the Respectful and Responsible Adults Act of Florida*" amending the Senate Joint Resolution 1028 title and approved by the U.S. Food Drug and Alcohol (FDA) as a legal, safe and beneficial drug in the State under the *Tay Tay's Mean 2 Go Green for the Respectful and Responsible Adults of Florida Act*.
- iii. A custom Medicinal marijuana license in and for the United States of America and the State of Florida pursuant to 21 USC § 801 (Congressional Findings and Declarations) and 21 USC § 802<sup>191</sup> as so in Defendant, Microsoft's headquarter State of Washington<sup>192</sup>; receiving up to 5 oz. per "free purchase" at his own will, which is not for resale and is a legal prescription for his medicinal pharmaceuticals, be it from any Florida Department of Law Enforcement agency in the State of Florida, and or any legal marijuana dispensary or agency in the State of Washington and or California and or any legal marijuana dispensary in the United States, and lifetime immunity from arrest by any United States of America and the State of Florida Department of Justice and or the Florida Department of Law Enforcement while anywhere in the jurisdiction of the United States of America for possession or any other

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<sup>191</sup> See sections (10) – dispense, (11) – distribute, (16) – Marijuana, (26) – State (State of Florida), (27) – Ultimate User, (28) – United States, (39) – Regulated Transaction, (55) – Refilling Prescriptions.

<sup>192</sup> Pursuant to RCW 69.51A.050, 69.51A.200 in pursuance to RCW 69.51A.010(3) and being a qualifying patient RCW 69.51A.010(4) with valid documentation pursuant to RCW 46.20.035(1)(b).



Federal and State marijuana crimes; and lawfully allowed to travel by airplane, train, vehicle, cruise vessel with possession of up to 5 oz. of marijuana per each arrival and departure pursuant to 21 USC § 955 (Possession on board vessels, etc.)... [replacing “unlawful” with “lawful”] pursuant to 19 CFR 162.62 - Permissible controlled substances on vessels, aircraft, and individuals; and 46a USC Rule – Manufacture, distribution, or possession with intent to manufacture controlled substances and 21 USC § 959 (Possession of controlled substances) [replacing “unlawful” with “lawful”] pursuant to 21 USC §§ 957 (Persons Required to register) (b)(1)(C), §958 (Registration Requirements) (a), and (b) having the United States pay all registration fees without denial from the Attorney General pursuant to 21 USC § § 822(d) and 823(c) pursuant to and as defined in 21 USC § 802(27) (“ultimate user”) and 21 USC § 956(a) (Exemption Authority);

- iv. Tay may operate a vehicle while consuming marijuana for Rastafari reasoning and recreational purposes. If Tay violates any traffic violations and consuming marijuana while operating a vehicle while violating any traffic violations during, before and after such times, Tay will be fined an additional \$1365 to his ticket violation;
- v. Award Tay full immunity from arrest for marijuana possession pursuant to 21 USC § 802(44) – Felony Drug Offenses.

- b. Paid for expenses for head and scalp surgery with the Brevard Skin and Cancer Center



c. Defendant, LabCorp must use Tay in a 30 day guinea pig experiment for declaration of *Tay Tay's Mean To Go Green for the Respectful and Responsible Adults Act of Florida* by conducting a safe and FDA approved educational research study on Tay and on behalf of those that share 'marijuana' interest, acknowledging his professional ethics, his driving, educating, physical exercise, his speech, his social and public relations, and most importantly his spiritual morals to verify and certify how Respectful and Responsible adults and guest of Florida should act under the influence of marijuana under this act.

i. LabCorp, the State of Florida and Tay must create a FDA approved website, video, DVD, and commercial(s) for Florida citizens demonstrating "good faith" medicinal and recreational ganja use. Tay must receive a \$3.65 million Name and Likeness Fee, and own all publishing rights to the website, video, DVD, and commercial.

pursuant to the International Covenant of Economic, Social and Cultural Rights.

598. To award Tay, from each Defendants and RICO Defendants, \$3.65 million relief paid the order of Tay's Florida inactive private s-corp. enterprise: FOCUS Solutions Limited, Inc. for special damages for suffered economic and livelihood harm; loss of profit, lost wages or income, mental frustrations, inability to do business and the enjoyment of life.

599. Relief ordering School Board to release to Tay a DVD copy of his public hearing on May 10, 2012 between him, Cocoa and the School Board with Hon. George Maxwell III presiding in the 18<sup>th</sup> Judicial Circuit in and for Brevard County, without dissemination for public view.



600. Relief enforcing The School Board to reinstate Tay's employment opportunity as a substitute teacher in Brevard County, FL by hiring him under special circumstances, Economic and Non-Economic damages pursuant to Fl. Stat. 766.02.
601. Relief that provide Tay's grandmother a free home remodeling by Christopher Burton Homes from the School Board.
602. Relief that would require each Defendant to write a personal letter of apology to Tay for the accrued discomfort they've caused him in their official or employee capacity of the USA. Signed by them in blue ball point pen under their respective seals no later than 10 days after ruling and/or settlement.
603. Relief mandating that McDonald's 365Black make Tay the official spokesperson of 365Black with a \$365, 000.00 yearly salary for up to 5 years, and %5 equity of common stock of (NYSE: MCD).
604. Injunctive relief has been granted to prevent officers or directors from breaching their fiduciary duties, particularly in cases of self-dealing or infringement on shareholder voting rights. *See Poynter v. Smith*, 120 Fla. 469, 162 So. 874 (1935); *Schwadel v. Uchitel*, 455 So.2d 401 (Fla. 3d DCA 1984). A court may issue injunctions in connection with corporate dissolutions. *See* § 607.1431(3), Fla. Stat. (2007). A trial court may issue an injunction to preserve corporate assets amid allegations of a deadlock among the shareholders and misapplication of corporate assets. *See Tabsch v. Nojaim*, 548 So.2d 851 (Fla. 3d DCA 1989).
605. Procedural due process imposes constraints on governmental decisions which deprive individuals of "liberty" or "property" interest within the meaning of the Due Process Clause of the 5<sup>th</sup> Amendment. *Nguyen v. Dep't of Health Med. Quality Assurance Comm'n.*, 144





Wn. 2d, 522-23 (2001) quoting *Matthews v. Eldridge*, 424, U.S. 319, 332, cert. denied, 535 U.S. 904 (2002).

**COUNT 50 – 42 USC § 1983**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

825. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

826. Defendants subjects, or causes to be subjected, Tay within the jurisdiction thereof, deprived Tay the right to a government free from corruption, fraud and dishonesty pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack and conspired, obstructed and deprived Tay the right to a government free from corruption, fraud and dishonesty of an Equal Employment Opportunity by and through the March 5, 2009 Document by way of USPS mail and through wire, radio, television and internet. As a result of the conspiracy, obstruction and deprivation, Tay suffers extreme and irreparable harm and is entitled to relief under titled section [1983].

**COUNT 51 – 42 USC § 1983**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

827. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this



claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

828. Defendants subjects, or causes to be subjected, Tay within the jurisdiction thereof, deprived Tay the right to a government free from corruption, fraud and dishonesty pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack and conspired, obstructed and deprived Tay the right to a government free from corruption, fraud and dishonesty of an obtaining and or acquiring his Self Made American Dream by and through the March 5, 2009 Document and through wire, radio, television and internet. As a result of the conspiracy, obstruction and deprivation, Tay suffers extreme and irreparable harm and is entitled to relief under titled section [1983].

**COUNT 52 – 42 USC § 1983**

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**

829. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

830. Defendants subjects, or causes to be subjected, Tay within the jurisdiction thereof, deprived Tay the right to a government free from corruption, fraud and dishonesty pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack pursuant to the March 5, 2009



Document and or the Tay Tay Terror Attack and conspired, obstructed and deprived Tay the right to a government free from corruption, fraud and dishonesty of a student and student - athlete by and through the March 5, 2009 Document and through wire, radio, television and internet. As a result of the conspiracy, obstruction and deprivation, Tay suffers extreme and irreparable harm and is entitled to relief under titled section [1983].

**COUNT 53 – 42 USC § 1983**

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**

831. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

832. Defendants subjects, or causes to be subjected, Tay within the jurisdiction thereof, deprived Tay the right to a government free from corruption, fraud and dishonesty pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack and conspired, obstructed and deprived Tay the right to a government free from corruption, fraud and dishonesty of an true and accurate drug test and or Chain of Custody for his drug test by and through the March 5, 2009 Document and through wire, radio, television and internet. As a result of the conspiracy, obstruction and deprivation, Tay suffers extreme and irreparable harm and is entitled to relief under titled section [1983].

**COUNT 54 – 42 USC § 1983**

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**



833. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

834. Defendants subjects, or causes to be subjected, Tay within the jurisdiction thereof, deprived Tay the right to a government free from corruption, fraud and dishonesty pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack and conspired, obstructed and deprived Tay the right to a government free from corruption, fraud and dishonesty of the SNAP program and Equal Employment Opportunities in the State. As a result of the conspiracy, obstruction and deprivation, Tay suffers extreme and irreparable harm and is entitled to relief under titled section [1983].

**COUNT 55 – 42 USC § 1983**

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**

835. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.



836. Defendants subjects, or causes to be subjected, Tay within the jurisdiction thereof, deprived Tay the right to a government free from corruption, fraud and dishonesty pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack and conspired, obstructed and deprived Tay the right to a government free from corruption, fraud and dishonesty of owning a Hotmail Account. As a result of the conspiracy, obstruction and deprivation, Tay suffers extreme and irreparable harm and is entitled to relief under the titled section [1983].

**COUNT 56 – 42 USC § 1983**

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**

837. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

838. Defendants subjects, or causes to be subjected, Tay within the jurisdiction thereof, deprived Tay the right to a government free from corruption, fraud and dishonesty pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack and conspired, obstructed and deprived Tay the right to a government free from corruption, fraud and dishonesty by illegally having Tay under surveillance with access to his property before and after February 9, 2009 pursuant to the herein *NSA Scheme* (See ¶139 – 150). As a result of the conspiracy, obstruction and



deprivation, Tay suffers extreme and irreparable harm and is entitled to relief under the titled section [1983].

**COUNT 57 – CONSPIRACY**

Pursuant to 18 USC § 371 (Conspiracy to commit offense to defraud United States)  
**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**  
839. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

840. Defendants subjects, or causes to be subjected, Tay within the jurisdiction thereof, deprived Tay the right to a government free from corruption, fraud and dishonesty pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack and conspired to defraud the United States, or any agency thereof in the manner of acts within the employment scheme for employment as a substitute teacher on, before and after March 5, 2009 for the purpose of trafficking Tay, benefitting from his human capitol and contract agreements, and conspiring to place or return Tay to poverty on, before and after February 9, 2009, wherefore the March 5, 2009 Document and illegal acts, herein Complaint, to effect the object of the conspiracy.

841. As a result of the harm done to Tay, he suffers damages. Tay in entitled to relief pursuant to 42 USC § 1983.

**COUNT 58 – CONSPIRACY**

Pursuant to 18 USC § 371 (Conspiracy to commit offense to defraud United States)  
**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**



842. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

843. Defendants subjects, or causes to be subjected, Tay within the jurisdiction thereof, deprived Tay the right to a government free from corruption, fraud and dishonesty pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack and conspired to defraud the United States, or any agency thereof in the manner of acts within the Tay Tay Terror Attack Surveillance on, before and after March 5, 2009 for the purpose of trafficking Tay, benefitting from his human capitol and contract agreements, and conspiring to place or return Tay to poverty on, before and after February 9, 2009, wherefore the March 5, 2009 Document and illegal acts, herein Complaint, to effect the object of the conspiracy.

844. As a result of the harm done to Tay, he suffers damages. Tay in entitled to relief pursuant to 42 USC § 1983.

#### **COUNT 59 – CONSPIRACY**

Pursuant to 18 USC § 371 (Conspiracy to commit offense to defraud United States)

**Under the Finkerton Doctrine Conspiracy, *Finkerton v. United States*, 220 U.S. 210 (1908),**

845. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this



claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

846. Defendants subjects, or causes to be subjected, Tay within the jurisdiction thereof, deprived Tay the right to a government free from corruption, fraud and dishonesty pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack and conspired to defraud the United States, or any agency including but not limited to the thereof in the manner of acts within the scheme for Tay to apply and receive public and or private student loans for the purpose of trafficking Tay, benefitting from his human capitol and contract agreements, and conspiring to place or return Tay to poverty on, before and after February 9, 2009, wherefore the March 5, 2009 Document and illegal acts, herein Complaint, to effect the object of the conspiracy.

847. As a result of the harm done to Tay, he suffers damages. Tay in entitled to relief pursuant to 42 USC § 1983.

#### **COUNT 60 – CONSPIRACY**

Pursuant to 18 USC § 371 (Conspiracy to commit offense to defraud United States)

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**

848. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.





849. Defendants subjects, or causes to be subjected, Tay within the jurisdiction thereof, deprived Tay the right to a government free from corruption, fraud and dishonesty pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack and conspired to defraud the United States, or any agency including but not limited to the thereof in the manner of acts within the *NSA Scheme* for the purpose of illegally trafficking Tay, and obtaining his data information and communication, benefitting from his human capitol and contract agreements, and conspiring to place or return Tay to poverty on, before and after February 9, 2009, wherefore the March 5, 2009 Document and illegal acts, herein Complaint, to effect the object of the conspiracy.
850. As a result of the harm done to Tay, he suffers damages. Tay in entitled to relief pursuant to 42 USC § 1983.

**COUNT 61 – CONSPIRACY**

Pursuant to 18 USC § 371 (Conspiracy to commit offense to defraud United States)  
~~Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)~~  
and by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

852. Defendants subjects, or causes to be subjected, Tay within the jurisdiction thereof, deprived Tay the right to a government free from corruption, fraud and dishonesty pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack and conspired to defraud the United States, or



any agency including but not limited to the thereof in the manner of acts within the *Food Stamp Scheme* for the purpose of trafficking Tay, benefitting from Tay's livelihood, his human capitol and contract agreements, and conspiring to place or return Tay to poverty on, before and after February 9, 2009, wherefore the March 5, 2009 Document and illegal acts, herein Complaint, to effect the object of the conspiracy.

853. As a result of the harm done to Tay, he suffers damages. Tay in entitled to relief pursuant to 42 USC § 1983.

#### **COUNT 62 – CONSPIRACY**

Pursuant to 18 USC § 371 (Conspiracy to commit offense to defraud United States)

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

854. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

855. Defendants subjects, or causes to be subjected, Tay within the jurisdiction thereof, deprived Tay the right to a government free from corruption, fraud and dishonesty pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack and conspired to defraud the United States, or any agency including but not limited to the thereof in the manner of acts within the *Marijuana Scheme* for the purpose of denying him a relationship with his God as a consumer of marijuana for religion purposes, to in the future arrest Tay for possession of marijuana to profit and defame Tay's character, trafficking Tay, benefitting from his human capitol and



contract agreements, and conspiring to place or return Tay to poverty on, before and after February 9, 2009, wherefore the March 5, 2009 Document and illegal acts, herein Complaint, to effect the object of the conspiracy.

856. As a result of the harm done to Tay, he suffers damages. Tay is entitled to relief pursuant to 42 USC § 1983.

**COUNT 63 – CONSPIRACY**

Pursuant to 18 USC § 371 (Conspiracy to commit offense to defraud United States)  
**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**  
857. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as

if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

858. Defendants subjects, or causes to be subjected, Tay within the jurisdiction thereof, deprived Tay the right to a government free from corruption, fraud and dishonesty pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack and conspired to defraud the United States, or any agency including but not limited to the thereof in the manner of acts within the *Obama Deception* for the purpose of getting Tay and his Name and Likeness to coerce voters to vote for Obama for a ‘better future’ including jobs, taking bribes and other financial contributions from companies, individuals and 501c organizations, trafficking Tay, benefitting from his human capitol and contract agreements, and conspiring to place or return Tay to poverty on,



before and after February 9, 2009, wherefore the March 5, 2009 Document and illegal acts, herein Complaint, to effect the object of the conspiracy.

859. As a result of the harm done to Tay, he suffers damages. Tay is entitled to relief pursuant to 42 USC § 1983.

**COUNT 64 – CONSPIRACY**

Pursuant to 18 USC § 371 (Conspiracy to commit offense to defraud United States)

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

860. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

861. Defendants subjects, or causes to be subjected, Tay within the jurisdiction thereof, deprived Tay the right to a government free from corruption, fraud and dishonesty pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack and conspired to defraud the United States, or any agency including but not limited to the thereof in the manner of acts within the scheme for Tay to apply and receive financial aid from USDOE to attend Everest University for the purpose of denying him education, the opportunity to better himself and Tay's livelihood, trafficking Tay, benefitting from his human capital and contract agreements, and conspiring to place or return Tay to poverty on, before and after February 9, 2009, wherefore the March 5, 2009 Document, the Everest denial at ¶241 and illegal acts, herein Complaint, to effect the object of the conspiracy.



862. As a result of the harm done to Tay, he suffers damages. Tay is entitled to relief pursuant to 42 USC § 1983.

**COUNT 65 – CONSPIRACY**

Pursuant to 18 USC § 371 (Conspiracy to commit offense to defraud United States)

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

863. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

864. Defendants subjects, or causes to be subjected, Tay within the jurisdiction thereof, deprived Tay the right to a government free from corruption, fraud and dishonesty pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack and conspired to defraud the United States, or any agency including but not limited to the thereof in the manner of acts within the tutoring scheme for the purpose of Tay educating poor children that live in certain areas receiving government benefits as a private contractor to increase those students learning capabilities, trafficking Tay, benefitting from his human capital and contract agreements, and conspiring to place or return Tay to poverty on, before and after February 9, 2009, wherefore the March 5, 2009 Document and illegal acts, herein Complaint, to effect the object of the conspiracy.

865. As a result of the harm done to Tay, he suffers damages. Tay is entitled to relief pursuant to 42 USC § 1983.

**COUNT 66 – CONSPIRACY**



Pursuant to 18 USC § 371 (Conspiracy to commit offense to defraud United States)  
**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**  
866. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as

if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

867. Defendants subjects, or causes to be subjected, Tay within the jurisdiction thereof, deprived Tay the right to a government free from corruption, fraud and dishonesty pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack and conspired to defraud the United States, or any agency including but not limited to the U.S. Department of Education and or the National Security Agency thereof in the manner of acts within the *Sunshine Connection* scheme for the purpose of tracking and tracing Tay as a student, and or student athlete, and or a individual with background history of Tay and his Exclusive Name and Likeness through the RICO Defendants K-20 Education Surveillance wherefore the School Board and the State to use Microsoft products through the Microsoft Licensing Agreement with Dell, SHI and GovConnection to deny Tay employment as a substitute teacher through USPS Certified Mail on March 5, 2009 based on a falsified drug test and prejudicial dating on the March 5, 2009 Document which implies a employment hoax in violation of and pursuant to 18 USC § 1346 ("Scheme or Artifice to Defraud"), to obtain any of the moneys, funds, credits, assets, securities, or other property owned by, or under the custody of, a financial institution, by



means of false or fraudulent pretenses, representations, or promises of doing legal business and or making legal transactions which were deposited into financial institutions unknown pursuant to the March 5, 2009 Document in violation of 18 USC § 1344 (“Bank Fraud”), trafficking Tay’s urine through a 18 USC § 1346 “marijuana drug test” scheme in violation of 18 USC § 1347 (“Health Care Fraud”) to defraud Tay’s Florida Chain of Custody forms for a Drug Free Workplace pursuant to Fl. Stat. 112. 0455 and 440.102 to obtain, by means of false or fraudulent pretenses, representations, or promises, any of the money or property owned by, or under the custody or control of, Tay’s Florida Chain of Custody forms in connection with the delivery of or payment for health care benefits, items, or services, benefitting from his human capitol and contract agreements, and conspiring to place or return Tay to poverty on, before and after February 9, 2009, wherefore the March 5, 2009 Document and illegal acts, herein Complaint, to effect the object of the conspiracy.

868. As a result of the harm done to Tay, he suffers damages. Tay in entitled to relief pursuant to 42 USC § 1983.

#### **COUNT 67 – CONSPIRACY**

Pursuant to 18 USC § 371 (Conspiracy to commit offense to defraud United States)

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**

869. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.



870. Defendants subjects, or causes to be subjected, Tay within the jurisdiction thereof, deprived Tay the right to a government free from corruption, fraud and dishonesty pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack and conspired to defraud the United States, or any agency including but not limited to the thereof in the manner of acts within the *MSN Hotmail Scheme* for the purpose of trafficking Tay, benefitting from his human capitol and contract agreements, and conspiring to place or return Tay to poverty on, before and after February 9, 2009, wherefore the March 5, 2009 Document and illegal acts within the *MSN Hotmail Scheme*, herein Complaint, to effect the object of the conspiracy.

871. As a result of the harm done to Tay, he suffers damages. Tay in entitled to relief pursuant to 42 USC § 1983.

#### **COUNT 68 – CONSPIRACY**

Pursuant to 18 USC § 371 (Conspiracy to commit offense to defraud United States)

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

872. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

873. Defendants subjects, or causes to be subjected, Tay within the jurisdiction thereof, deprived Tay the right to a government free from corruption, fraud and dishonesty pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack and conspired to defraud the United States, or





any agency including but not limited to the, National Security Agency thereof in the manner of acts within the *Computer Hacking Scheme* for the purpose of illegally hack into Tay's computer to have access to his data info, trafficking Tay, benefitting from his human capitol and contract agreements, and conspiring to place or return Tay to poverty on, before and after February 9, 2009, wherefore the March 5, 2009 Document and illegal acts within the *Computer Hacking Scheme*, herein Complaint, to effect the object of the conspiracy.

874. As a result of the harm done to Tay, he suffers damages. Tay is entitled to relief pursuant to 42 USC § 1983.

**COUNT 69 - BANK FRAUD**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

875. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein.

876. Pursuant to the Tay Tay Terror Attack, Defendants devised *the MSN Scheme* to defraud a financial institution with Dirty Money or to obtain Dirty Money or moneys, funds, credits, assets, securities or other property owned by, or under the custody of, a financial institution on, before and after February 9, 2009 pursuant to the March 5, 2009 Document, by means of false or fraudulent pretenses, representations or promises of engaging in lawful activity in its transactions with particular banks pursuant to the March 5, 2009 Document with an intent to



defraud Tay with intent to cause economic harm to Tay on, before and after February 9, 2009.

**COUNT 70 - BANK FRAUD**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**  
877. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as

if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

878. Pursuant to the Tay Tay Terror Attack, Defendants devised the *NSA Scheme* to defraud a financial institution with Dirty Money or to obtain Dirty Money or to obtain moneys, funds, credits, assets, securities or other property owned by, or under the custody of, a financial institution, by means of false or fraudulent pretenses, representations or promises of engaging in lawful activity in its transactions with particular banks pursuant to the March 5, 2009 Document with an intent to defraud Tay with intent to cause economic harm to Tay on, before and after February 9, 2009.

**COUNT 71 - BANK FRAUD**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**  
879. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as

if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

880. Pursuant to the Tay Tay Terror Attack, Defendants devised the *Education – Employment Scheme* to defraud a financial institution with Dirty Money or to obtain Dirty Money or to obtain moneys, funds, credits, assets, securities or other property owned by, or under the custody of, a financial institution, by means of false or fraudulent pretenses, representations or promises of engaging in lawful activity in its transactions with particular banks pursuant to



the March 5, 2009 Document with an intent to defraud Tay with intent to cause economic harm to Tay on, before and after February 9, 2009.

**COUNT 72 - BANK FRAUD**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

881. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

882. Pursuant to the Tay Tay Terror Attack, Defendants devised *The United States Private Tutoring Scheme* to defraud a financial institution with Dirty Money or to obtain Dirty Money or to obtain moneys, funds, credits, assets, securities or other property owned by, or under the custody of, a financial institution, by means of false or fraudulent pretenses, representations or promises of engaging in lawful activity in its transactions with particular banks pursuant to the March 5, 2009 Document with an intent to defraud Tay with intent to cause economic harm to Tay on, before and after February 9, 2009.

**COUNT 73 - BANK FRAUD**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

883. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

884. Pursuant to the Tay Tay Terror Attack, Defendants devised the *Food Stamp Scheme* to defraud a financial institution, such as Chase and the U.S. Department of Treasury with Dirty Money or to obtain Dirty Money or to obtain moneys, funds, credits, assets, securities or other property owned by, or under the custody of, a financial institution such as Chase and the U.S. Department of Treasury, by means of false or fraudulent pretenses, representations or promises of engaging in lawful activity in its transactions with particular banks pursuant to



the March 5, 2009 Document with an intent to defraud Tay with intent to cause economic harm to Tay on, before and after February 9, 2009.

**COUNT 74 - BANK FRAUD**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**  
885. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as

if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

886. Pursuant to the Tay Tay Terror Attack, Defendants devised the *Marijuana Discrimination Scheme* to defraud a financial institution, such as AIG with Dirty Money or to obtain Dirty Money or to obtain moneys, funds, credits, assets, securities or other property owned by, or under the custody of, a financial institution, by means of false or fraudulent pretenses, representations or promises of engaging in lawful activity in its transactions with particular banks pursuant to the March 5, 2009 Document with an intent to defraud Tay with intent to cause economic harm to Tay on, before and after February 9, 2009.

**COUNT 75 - BANK FRAUD**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**  
887. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as

if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

888. Pursuant to the Tay Tay Terror Attack, Defendants devised the *Florida Illegal Gambling Scheme* to defraud a financial institution with Dirty Money or to obtain Dirty Money or to obtain moneys, funds, credits, assets, securities or other property owned by, or under the custody of, a financial institution, by means of false or fraudulent pretenses, representations or promises of engaging in lawful activity in its transactions with particular banks pursuant to



the March 5, 2009 Document with an intent to defraud Tay with intent to cause economic harm to Tay on, before and after February 9, 2009.

**COUNT 76 - HEALTH CARE FRAUD**

**Pursuant to 18 USC § 1347**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

889. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

890. Neil Dash knowingly and willfully executed, or attempted to execute, a scheme or artifice to defraud Tay's pre employment drug test Florida Chain of Custody form from February 23, 2009 to defraud the Florida Chain of Custody form and Tay's drug test pursuant to the March 5, 2009 Document to obtain, by means of false or fraudulent pretenses, representations, or promises, any of the money or property owned by, or under the custody or control of Tay's pre employment drug test Florida Chain of Custody form from February 23, 2009 in connection with the delivery of or payment for Tay's pre employment drug test Florida Chain of Custody form, items or services with an intent to defraud Tay with intent to cause economic harm to Tay on, before and after February 9, 2009.

**COUNT 80 - HEALTH CARE FRAUD**

**Pursuant to 18 USC § 1347**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

891. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

892. LabCorp knowingly and willfully executed, or attempted to execute, a scheme or artifice to defraud Tay's pre employment drug test Florida Chain of Custody form from February 23, 2009 to defraud the Florida Chain of Custody form and Tay's drug test pursuant to the March



5, 2009 Document to obtain, by means of false or fraudulent pretenses, representations, or promises, any of the money or property owned by, or under the custody or control of Tay's pre employment drug test Florida Chain of Custody form from February 23, 2009 in connection with the delivery of or payment for Tay's pre employment drug test Florida Chain of Custody form, items or services with an intent to defraud Tay with intent to cause economic harm to Tay on, before and after February 9, 2009.

**COUNT 81 - HEALTH CARE FRAUD**

**Pursuant to 18 USC § 1347**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**  
893. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

894. School Board knowingly and willfully executed, or attempted to execute, a scheme or artifice to defraud Tay's pre employment drug test Florida Chain of Custody form from February 23, 2009 to defraud the Florida Chain of Custody form and Tay's drug test pursuant to the March 5, 2009 Document to obtain, by means of false or fraudulent pretenses, representations, or promises, any of the money or property owned by, or under the custody or control of Tay's pre employment drug test Florida Chain of Custody form from February 23, 2009 in connection with the delivery of or payment for Tay's pre employment drug test Florida Chain of Custody form, items or services with an intent to defraud Tay with intent to cause economic harm to Tay on, before and after February 9, 2009.

**COUNT 82 - HEALTH CARE FRAUD**

**Pursuant to 18 USC § 1347**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**



895. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

896. Neil Dash, LabCorp, School Board, and the State knowingly and willfully executed, or attempted to execute, a scheme or artifice to defraud Tay's pre employment drug test Florida Chain of Custody form from February 23, 2009 to defraud the Florida Chain of Custody form and Tay's drug test pursuant to the March 5, 2009 Document to obtain, by means of false or fraudulent pretenses, representations, or promises, any of the money or property owned by, or under the custody or control of Tay's pre employment drug test Florida Chain of Custody form from February 23, 2009 in connection with the delivery of or payment for Tay's pre employment drug test Florida Chain of Custody form, items or services with an intent to defraud Tay with intent to cause economic harm to Tay on, before and after February 9, 2009.

**COUNT 83 - HEALTH CARE FRAUD**

**Pursuant to 18 USC § 1347**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

897. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

898. Neil Dash, LabCorp, the School Board, the State, Microsoft, Dell, SHI, GovConnection, UDHHS, USDOE knowingly and willfully executed, or attempted to execute, a scheme or artifice to defraud Tay's pre employment drug test Florida Chain of Custody form from February 23, 2009 to defraud the Florida Chain of Custody form and Tay's drug test pursuant to the March 5, 2009 Document to obtain, by means of false or fraudulent pretenses, representations, or promises, any of the money or property owned by, or under the custody or



control of Tay's pre employment drug test Florida Chain of Custody form from February 23, 2009 in connection with the delivery of or payment for Tay's pre employment drug test Florida Chain of Custody form, items or services with an intent to defraud Tay with intent to cause economic harm to Tay on, before and after February 9, 2009.

**COUNT 84 - CONSPIRACY TO COMMIT HEALTH CARE FRAUD**

**Pursuant to 18 USC §§ 1347, 1349**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**  
899. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as

if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

900. Defendants knowingly and willfully executed, or attempted to execute, a scheme or artifice to defraud Tay's pre employment drug test Florida Chain of Custody form from February 23, 2009 to defraud the Florida Chain of Custody form and Tay's drug test on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and the Tay Tay Terror Attack to obtain, by means of false or fraudulent pretenses, representations, or promises, any of the money or property owned by, or under the custody or control of Tay's pre employment drug test Florida Chain of Custody form from February 23, 2009 in connection with the delivery of or payment for Tay's pre employment drug test Florida Chain of Custody form, items or services with an intent to defraud Tay with intent to cause economic harm to Tay on, before and after February 9, 2009.

**COUNT 85 - FALSE STATEMENTS RELATING TO HEALTH CARE MATTERS**

**Pursuant to 18 USC § 1035 and 18 USC § 1018**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**





901. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

902. Neil Dash, being a Medical Review Officer or a public offer to make or give a certificate or other writing such as Tay's drug test, knowingly makes and delivers Tay's drug test as true such certificate or writing, containing any statement which he knew to be false pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack knowingly and willfully falsified, concealed and covered up by a confidence trick, Tay Tay Terror Attack scheme and or device Tay's pre employment drug test Florida Chain of Custody form and or made materially false, fictitious, or fraudulent statements or representations, or makes or uses any materially false writing or document knowing the same to contain any materially false, fictitious or fraudulent statement or entry of Tay's confirmed drug test(s) in connection with the delivery or payment for the pre employment Florida Chain of Custody form, items or services pursuant to the March 5, 2009 Document to execute, a scheme or artifice to defraud Tay's pre employment drug test Florida Chain of Custody form from February 23, 2009 to defraud the Florida Chain of Custody form and Tay's drug test pursuant to the March 5, 2009 Document to obtain, by means of false or fraudulent pretenses, representations, or promises, any of the money or property owned by, or under the custody or control of Tay's pre employment drug test Florida Chain of Custody form from February 23, 2009 in connection with the delivery of or payment for Tay's pre employment drug test Florida Chain of Custody form, items or services with an intent to defraud Tay with intent to cause economic harm to Tay on, before and after February 9, 2009.

**COUNT 86 - FALSE STATEMENTS RELATING TO HEALTH CARE MATTERS**  
**Pursuant to 18 USC § 1035**



**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**  
903. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as

if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

904. LabCorp knowingly and willfully falsified, concealed and covered up by a confidence trick, Tay Tay Terror Attack scheme and or device Tay's pre employment drug test Florida Chain of Custody form and or made materially false, fictitious, or fraudulent statements or representations, or makes or uses any materially false writing or document knowing the same to contain any materially false, fictitious or fraudulent statement or entry of Tay's confirmed drug test(s) in connection with the delivery or payment for the pre employment Florida Chain of Custody form, items or services on, before and after February 9, 2009 pursuant to the March 5, 2009 Document to execute, a scheme or artifice to defraud Tay's pre employment drug test Florida Chain of Custody form from February 23, 2009 to defraud the Florida Chain of Custody form and Tay's drug test pursuant to the March 5, 2009 Document to obtain, by means of false or fraudulent pretenses, representations, or promises, any of the money or property owned by, or under the custody or control of Tay's pre employment drug test Florida Chain of Custody form from February 23, 2009 in connection with the delivery of or payment for Tay's pre employment drug test Florida Chain of Custody form, items or services with an intent to defraud Tay with intent to cause economic harm to Tay on, before and after February 9, 2009.

**COUNT 87 - FALSE STATEMENTS RELATING TO HEALTH CARE MATTERS**  
**Pursuant to 18 USC §§1018, 1035**  
**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**



905. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

906. The School Board or a being a public offer to make or give a certificate or other writing such as Tay's drug test, knowingly makes and delivers Tay's drug test as true such certificate or writing, containing any statement which he knew to be false pursuant to the March 5, 2009 Document and the herein Tay Tay Terror Attack knowingly and willfully falsified, concealed and covered up by a confidence trick, Tay Tay Terror Attack scheme and or device Tay's pre employment drug test Florida Chain of Custody form and or made materially false, fictitious, or fraudulent statements or representations, or makes or uses any materially false writing or document knowing the same to contain any materially false, fictitious or fraudulent statement or entry of Tay's confirmed drug test(s) in connection with the delivery or payment for the pre employment Florida Chain of Custody form, items or services pursuant to the March 5, 2009 Document to execute, a scheme or artifice to defraud Tay's pre employment drug test Florida Chain of Custody form from February 23, 2009 to defraud the Florida Chain of Custody form and Tay's drug test on, before and after February 9, 2009 pursuant to the March 5, 2009 Document to obtain, by means of false or fraudulent pretenses, representations, or promises, any of the money or property owned by, or under the custody or control of Tay's pre employment drug test Florida Chain of Custody form from February 23, 2009 in connection with the delivery of or payment for Tay's pre employment drug test Florida Chain of Custody form, items or services with an intent to defraud Tay with intent to cause economic harm to Tay on, before and after February 9, 2009.

**COUNT 88 - FALSE STATEMENTS RELATING TO HEALTH CARE MATTERS**  
**Pursuant to 18 USC § 1035**



**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**  
907. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as

if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

908. School Board knowingly and willfully falsified, concealed and covered up by a confidence trick, Tay Tay Terror Attack scheme and or device Tay's pre employment drug test Florida Chain of Custody form and or made materially false, fictitious, or fraudulent statements or representations, or makes or uses any materially false writing or document knowing the same to contain any materially false, fictitious or fraudulent statement or entry of Tay's confirmed drug test(s) in connection with the delivery or payment for the pre employment Florida Chain of Custody form, items or services on, before and after February 9, 2009 pursuant to the March 5, 2009 Document to execute, a scheme or artifice to defraud Tay's pre employment drug test Florida Chain of Custody form from February 23, 2009 to defraud the Florida Chain of Custody form and Tay's drug test pursuant to the March 5, 2009 Document to obtain, by means of false or fraudulent pretenses, representations, or promises, any of the money or property owned by, or under the custody or control of Tay's pre employment drug test Florida Chain of Custody form from February 23, 2009 in connection with the delivery of or payment for Tay's pre employment drug test Florida Chain of Custody form, items or services with an intent to defraud Tay with intent to cause economic harm to Tay on, before and after February 9, 2009.

**COUNT 89 - FALSE STATEMENTS RELATING TO HEALTH CARE MATTERS**  
**Pursuant to 18 USC §§ 1035**  
**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**



909. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

910. Defendants knowingly and willfully falsified, concealed and covered up by a confidence trick, Tay Tay Terror Attack scheme and or device Tay's pre employment drug test Florida Chain of Custody form and or made materially false, fictitious, or fraudulent statements or representations, or makes or uses any materially false writing or document knowing the same to contain any materially false, fictitious or fraudulent statement or entry of Tay's confirmed drug test(s) in connection with the delivery or payment for the pre employment Florida Chain of Custody form, items or services pursuant to the March 5, 2009 Document to execute, a scheme or artifice to defraud Tay's pre employment drug test Florida Chain of Custody form from February 23, 2009 to defraud the Florida Chain of Custody form and Tay's drug test pursuant to the March 5, 2009 Document to obtain, by means of false or fraudulent pretenses, representations, or promises, any of the money or property owned by, or under the custody or control of Tay's pre employment drug test Florida Chain of Custody form from February 23, 2009 in connection with the delivery of or payment for Tay's pre employment drug test Florida Chain of Custody form, items or services with an intent to defraud Tay with intent to cause economic harm to Tay on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or Tay Tay Terror Attack.

**COUNT 90 – MONEY LAUNDERING**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

911. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.



912. Defendants knowing that Tay's property involved in a financial transaction for employment as a substitute teacher represents the proceeds of some form of unlawful activity, conducts or attempts to conduct such a financial transaction which in fact involves the proceeds of mail, wire, health care and bank fraud with Dirty Money on, before and or after February 9, 2009 pursuant to 18 USC 1341, 1343, 1344, 1347 pursuant to the March 5, 2009 Document and the Tay Tay Terror Attack on, before and after February 9, 2009 with the intent to promote the carrying on of mail, wire and bank fraud pursuant to the March 5, 2009 Document and the Tay Tay Terror Attack on, before and after February 9, 2009 knowing that the transaction is designed in whole or in part to conceal and or disguise the nature, the location, the source, the ownership, or the control of the proceeds of the mail, wire, health care and bank fraud on, before and after February 9, 2009. Pursuant to 18 USC § 1956 as defined in 31 USC § 5340(2).
913. Defendants transported, transmitted, and or transferred, or attempts to transport, transmit, or transfer fraud with Dirty Money; any coin or currency of the United States or of any other country, travelers' checks, personal checks, bank checks, and money orders, or investment securities or negotiable instruments on, before and or after February 9, 2009, in bearer form or funds from a place in the United States to or through a place outside the United States and or to a place in the United States from or through a place outside the United States with the intent to promote the carrying on of mail, wire, health care and bank fraud and or knowing that the coin or currency of the United States or of any other country, travelers' checks, personal checks, bank checks, and money orders, or investment securities or negotiable instruments, in bearer form or funds involved in the transportation, transmission or transfer represents the proceeds of some form of mail, wire, health care and bank fraud



and knowing that such transportation, transmission or transfer is designed in whole or in part to conceal or disguise the nature, the source, the ownership or the control of proceeds from the mail, wire, health care and bank fraud pursuant to the March 5, 2009 Document and the Tay Tay Terror Attack on, before and after February 9, 2009.

914. Defendants, with the intent to promote the carrying out of mail, wire, health care and bank fraud pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack on, before and after February 9, 2009 to conceal and or disguise the nature, location, source, ownership or control of Tay's property believed to be proceeds of mail, wire, health care and bank fraud pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack conducted and or attempted to conduct a transaction which in any way or degree affects interstate or foreign commerce involving the movement of funds by wire or other means or involving one or more monetary instruments, or involving the transfer of title to any real property, vehicle, vessel, or aircraft, or a transaction involving the use of a financial institution which is engaged in, or the activities of which affect, interstate or foreign commerce pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack on, before and after February 9, 2009 involving Tay's property represented to be proceeds of mail, wire, health care and bank fraud and or property such as, LabCorp to conduct or facilitate mail, wire, health care and bank fraud pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack.

**COUNT 91 – MONEY LAUNDERING**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

915. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.



916. Defendants knowing that Tay's property involved in a financial transaction for education at FAMU represents the proceeds of some form of unlawful activity, conducts or attempts to conduct such a financial transaction which in fact involves the proceeds of mail, wire, health care and bank fraud with Dirty Money on, before and or after February 9, 2009 pursuant to 18 USC 1341, 1343, 1344, 1347 pursuant to the March 5, 2009 Document and the Tay Tay Terror Attack on, before and after February 9, 2009 with the intent to promote the carrying on of mail, wire and bank fraud pursuant to the March 5, 2009 Document and the Tay Tay Terror Attack on, before and after February 9, 2009 knowing that the transaction is designed in whole or in part to conceal and or disguise the nature, the location, the source, the ownership, or the control of the proceeds of the mail, wire, health care and bank fraud on, before and after February 9, 2009. Pursuant to 18 USC § 1956 as defined in 31 USC § 5340(2).

917. Defendants transported, transmitted, and or transferred, or attempts to transport, transmit, or transfer Dirty Money on, before and or after February 9, 2009, in bearer form or funds from a place in the United States to or through a place outside the United States and or to a place in the United States from or through a place outside the United States with the intent to promote the carrying on of mail, wire, health care and bank fraud and or knowing that the coin or currency of the United States or of any other country, travelers' checks, personal checks, bank checks, and money orders, or investment securities or negotiable instruments, in bearer form or funds involved in the transportation, transmission or transfer represents the proceeds of some form of mail, wire, health care and bank fraud and knowing that such transportation, transmission or transfer is designed in whole or in part to conceal or disguise the nature, the source, the ownership or the control of proceeds from the mail, wire, health





care and bank fraud pursuant to the March 5, 2009 Document and the Tay Tay Terror Attack on, before and after February 9, 2009.

918. Defendants, with the intent to promote the carrying out of mail, wire, health care and bank fraud with Dirty Money on, before and or after February 9, 2009 pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack on, before and after February 9, 2009 to conceal and or disguise the nature, location, source, ownership or control of Tay's property believed to be proceeds of mail, wire, health care and bank fraud pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack conducted and or attempted to conduct a transaction which in any way or degree affects interstate or foreign commerce involving the movement of funds by wire or other means or involving one or more monetary instruments, or involving the transfer of title to any real property, vehicle, vessel, or aircraft, or a transaction involving the use of a financial institution which is engaged in, or the activities of which affect, interstate or foreign commerce pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack on, before and after February 9, 2009 involving Tay's property represented to be proceeds of mail, wire, health care and bank fraud and or property such as, LabCorp to conduct or facilitate mail, wire, health care and bank fraud pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack.

**COUNT 92 – MONEY LAUNDERING**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

919. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

920. Defendants, School Board, Microsoft, State, FDOE, Dell, SMI and GovConnection knowing that Tay's property involved in a financial transaction for the *Sunshine Connection*



to collect Tay's data represents the proceeds of some form of unlawful activity, conducts or attempts to conduct such a financial transaction which in fact involves the proceeds of mail, wire, health care and bank fraud with Dirty Money on, before and or after February 9, 2009 pursuant to 18 USC 1341, 1343, 1344, 1347 pursuant to the March 5, 2009 Document and the Tay Tay Terror Attack on, before and after February 9, 2009 with the intent to promote the carrying on of mail, wire and bank fraud pursuant to the March 5, 2009 Document and the Tay Tay Terror Attack on, before and after February 9, 2009 knowing that the transaction is designed in whole or in part to conceal and or disguise the nature, the location, the source, the ownership, or the control of the proceeds of the mail, wire, health care and bank fraud on, before and after February 9, 2009. Pursuant to 18 USC § 1956 as defined in 31 USC § 5340(2).

921. Defendants transported, transmitted, and or transferred, or attempts to transport, transmit, or transfer with Dirty Money on, before and or after February 9, 2009, in bearer form or funds from a place in the United States to or through a place outside the United States and or to a place in the United States from or through a place outside the United States with the intent to promote the carrying on of mail, wire, health care and bank fraud and or knowing that the coin or currency of the United States or of any other country, travelers' checks, personal checks, bank checks, and money orders, or investment securities or negotiable instruments, in bearer form or funds involved in the transportation, transmission or transfer represents the proceeds of some form of mail, wire, health care and bank fraud and knowing that such transportation, transmission or transfer is designed in whole or in part to conceal or disguise the nature, the source, the ownership or the control of proceeds from the mail, wire,



health care and bank fraud pursuant to the March 5, 2009 Document and the Tay Tay Terror Attack on, before and after February 9, 2009.

922. Defendants, with the intent to promote the carrying out of mail, wire, health care and bank fraud with Dirty Money on, before and or after February 9, 2009 pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack on, before and after February 9, 2009 to conceal and or disguise the nature, location, source, ownership or control of Tay's property believed to be proceeds of mail, wire, health care and bank fraud pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack conducted and or attempted to conduct a transaction which in any way or degree affects interstate or foreign commerce involving the movement of funds by wire or other means or involving one or more monetary instruments, or involving the transfer of title to any real property, vehicle, vessel, or aircraft, or a transaction involving the use of a financial institution which is engaged in, or the activities of which affect, interstate or foreign commerce pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack on, before and after February 9, 2009 involving Tay's property represented to be proceeds of mail, wire, health care and bank fraud and or property such as, LabCorp to conduct or facilitate mail, wire, health care and bank fraud pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack.

**COUNT 93 - SECURITIES AND COMMODITIES FRAUD**

**Pursuant to 18 USC § 1348**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

923. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

924. Defendants and or RICO Defendants knowingly executes, or attempts to execute, the *MSN Hotmail Scheme* to defraud Tay and or any person in connection with any commodity



for future delivery, or any option on a commodity such as education, employment, entrepreneurship and or the American Dream or “commodity” as defined in 7 CFR § 247.1 (“commodity”) and 16 CFR § 503.5 for future delivery, or any security of an issuer with a class of securities registered under section 12 of the Securities Exchange Act of 1934 (15 U.S.C. 78l) pursuant to Defendants with publicly traded stock with a stock symbol, or that is required to file reports under section 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78o (d)); who obtained, by means of false or fraudulent pretenses, representations, or promises pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack, money and or property in connection with the purchase or sale of herein commodities or defined commodities pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack for future delivery, or any option on a commodity for future delivery.

**COUNT 94 - SECURITIES AND COMMODITIES FRAUD**  
**Pursuant to 18 USC § 1348**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**  
925. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as

if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

926. Defendants and or RICO Defendants knowingly executes, or attempts to execute, the *NSA Scheme* to defraud Tay and or any person in connection with any commodity for future delivery, or any option on a commodity such as education, employment, entrepreneurship and or the American Dream or “commodity” as defined in 7 CFR § 247.1 (“commodity”) and 16 CFR § 503.5 for future delivery, or any security of an issuer with a class of securities registered under section 12 of the Securities Exchange Act of 1934 (15 U.S.C. 78l) pursuant to Defendants with publicly traded stock with a stock symbol, or that is required to file reports under section 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78o (d)); who



obtained, by means of false or fraudulent pretenses, representations, or promises pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack, money and or property in connection with the purchase or sale of herein commodities or defined commodities pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack for future delivery, or any option on a commodity for future delivery.

**COUNT 95 - SECURITIES AND COMMODITIES FRAUD**

**Pursuant to 18 USC § 1348**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**  
927. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as

if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

928. Defendants and or RICO Defendants knowingly executes, or attempts to execute, the *Education and Employment Scheme* to defraud Tay and or any person in connection with any commodity for future delivery, or any option on a commodity such as education, employment, entrepreneurship and or the American Dream or “commodity” as defined in 7 CFR § 247.1 (“commodity”) and 16 CFR § 503.5 for future delivery, or any security of an issuer with a class of securities registered under section 12 of the Securities Exchange Act of 1934 (15 U.S.C. 78l) pursuant to Defendants with publicly traded stock with a stock symbol, or that is required to file reports under section 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78o (d)); who obtained, by means of false or fraudulent pretenses, representations, or promises pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack, money and or property in connection with the purchase or sale of herein commodities or defined commodities pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack for future delivery, or any option on a commodity for future delivery.

**COUNT 96 - SECURITIES AND COMMODITIES FRAUD**



**Pursuant to 18 USC § 1348**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

929. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as

if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

930. Defendants and or RICO Defendants knowingly executes, or attempts to execute, the

*United States Private Tutoring Scheme* to defraud Tay and or any person in connection with

any commodity for future delivery, or any option on a commodity such as education,

employment, entrepreneurship and or the American Dream or “commodity” as defined in 7

CFR § 247.1 (“commodity”) and 16 CFR § 503.5 for future delivery, or any security of an

issuer with a class of securities registered under section 12 of the Securities Exchange Act of

1934 (15 U.S.C. 78l) pursuant to Defendants with publicly traded stock with a stock symbol,

or that is required to file reports under section 15(d) of the Securities Exchange Act of 1934

(15 U.S.C. 78o (d)); who obtained, by means of false or fraudulent pretenses, representations,

or promises pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack,

money and or property in connection with the purchase or sale of herein commodities or

defined commodities pursuant to the March 5, 2009 Document and or the Tay Tay Terror

Attack for future delivery, or any option on a commodity for future delivery.

**COUNT 97 - SECURITIES AND COMMODITIES FRAUD**

**Pursuant to 18 USC § 1348**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

931. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as

if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

932. Defendants and or RICO Defendants knowingly executes, or attempts to execute, the

*Florida Illegal Gambling Scheme* to defraud Tay and or any person in connection with any



commodity for future delivery, or any option on a commodity such as education, employment, entrepreneurship and or the American Dream or “commodity” as defined in 7 CFR § 247.1 (“commodity”) and 16 CFR § 503.5 for future delivery, or any security of an issuer with a class of securities registered under section 12 of the Securities Exchange Act of 1934 (15 U.S.C.78l) pursuant to Defendants with publicly traded stock with a stock symbol, or that is required to file reports under section 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78o (d)); who obtained, by means of false or fraudulent pretenses, representations, or promises pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack, money and or property in connection with the purchase or sale of herein commodities or defined commodities pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack for future delivery, or any option on a commodity for future delivery.

**COUNT 98 - SECURITIES AND COMMODITIES FRAUD**

**Pursuant to 18 USC § 1348**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**  
933. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

934. Defendants and or RICO Defendants knowingly executes, or attempts to execute, the *Food Stamp Scheme* to defraud Tay and or any person in connection with any commodity for future delivery, or any option on a commodity such as education, employment, entrepreneurship and or the American Dream or “commodity” as defined in 7 CFR § 247.1 (“commodity”) and 16 CFR § 503.5 for future delivery, or any security of an issuer with a class of securities registered under section 12 of the Securities Exchange Act of 1934 (15 U.S.C.78l) pursuant to Defendants with publicly traded stock with a stock symbol, or that is required to file reports under section 15(d) of the Securities Exchange Act of 1934



(15 U.S.C. 78o (d)); who obtained, by means of false or fraudulent pretenses, representations, or promises pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack, money and or property in connection with the purchase or sale of herein commodities or defined commodities pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack for future delivery, or any option on a commodity for future delivery.

**COUNT 99 - SECURITIES AND COMMODITIES FRAUD**

**Pursuant to 18 USC § 1348**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

935. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

936. Defendants and or RICO Defendants knowingly executes, or attempts to execute, the *Marijuana Discrimination Scheme* to defraud Tay and or any person in connection with any commodity for future delivery, or any option on a commodity such as agricultural, education, employment, entrepreneurship and or the American Dream or “commodity” as defined in 7 CFR § 247.1 (“commodity”) and 16 CFR § 503.5 for future delivery, or any security of an issuer with a class of securities registered under section 12 of the Securities Exchange Act of 1934 (15 U.S.C. 78l) pursuant to Defendants with publicly traded stock with a stock symbol, or that is required to file reports under section 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78o (d)); who obtained, by means of false or fraudulent pretenses, representations, or promises pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack, money and or property in connection with the purchase or sale of herein commodities or defined commodities pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack for future delivery, or any option on a commodity for future delivery.

**COUNT 100 - SECURITIES AND COMMODITIES FRAUD**





**Pursuant to 18 USC § 1348**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

937. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

938. Defendants and or RICO Defendants knowingly executes, or attempts to execute, the *Delayed Justice Scheme* to defraud Tay and or any person in connection with any commodity for future delivery, or any option on a commodity such as education, employment, entrepreneurship and or the American Dream or “commodity” as defined in 7 CFR § 247.1 (“commodity”) and 16 CFR § 503.5 for future delivery, or any security of an issuer with a class of securities registered under section 12 of the Securities Exchange Act of 1934 (15 U.S.C. 78l) pursuant to Defendants with publicly traded stock with a stock symbol, or that is required to file reports under section 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78o (d)); who obtained, by means of false or fraudulent pretenses, representations, or promises pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack, money and or property in connection with the purchase or sale of herein commodities or defined commodities pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack for future delivery, or any option on a commodity for future delivery.

**COUNT 101 - SECURITIES AND COMMODITIES FRAUD**

**Pursuant to 18 USC § 1348**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

939. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the



Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

940. Defendants and or RICO Defendants knowingly executes, or attempts to execute, the *Defamation Scheme* to defraud Tay and or any person in connection with any commodity for future delivery, or any option on a commodity such as education, employment, entrepreneurship and or the American Dream or “commodity” as defined in 7 CFR § 247.1 (“commodity”) and 16 CFR § 503.5 for future delivery, or any security of an issuer with a class of securities registered under section 12 of the Securities Exchange Act of 1934 (15 U.S.C.78l) pursuant to Defendants with publicly traded stock with a stock symbol, or that is required to file reports under section 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78o (d)); who obtained, by means of false or fraudulent pretenses, representations, or promises pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack, money and or property in connection with the purchase or sale of herein commodities or defined commodities pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack for future delivery, or any option on a commodity for future delivery.

**COUNT 102 - CONSPIRACY TO DEPRIVE RIGHTS**  
**42 USC§ 1985(1)**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

941. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this



claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

942. Defendants or RICO Defendants in the State and any other state or Territory conspired to prevent, by force, intimidation, or threat, Tay from accepting or holding any office, trust, or place of confidence under the United States, such as Mayor of Cocoa and or any other political office in the State after March 5, 2009.

**COUNT 103 - CONSPIRACY TO DEPRIVE RIGHTS**  
**42 USC§ 1985(2)**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

943. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

944. Defendants and or RICO Defendants in the State or Territory conspired to deter, by force, intimidation, or threat, Tay in the Middle District of Florida – Orlando Division, Southern District of Florida – Miami Division, Washington District Court – Seattle Division and other herein mentioned District Courts of the United States from attending such court, or from testifying to the matter pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack pending herein, freely, fully, and truthfully, and to injure Tay in his person or property on account of his having so attended or testified, and or to influence the verdict, presentment, and or indictment of any grand or petit juror in any such court, and or Defendants conspired for the purpose of impeding, hindering, obstructing, or defeating, in any manner, the due course of justice in the State or Territory, with intent to deny Tay the



equal protection of the State and or Equal Employment Opportunity and or any law including but not limited to Fl. Stat. 112.0455 and or 440.102 to injure Tay or Tay's property for lawfully enforcing, and or attempting to enforce, the right of Tay, to the equal protection of the laws;

**COUNT 104 - CONSPIRACY TO DEPRIVE RIGHTS**

**42 USC§ 1985(2)**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

945. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

946. Defendants conspired, obstructed and deprived Tay the right to a government free from corruption, fraud and dishonesty of an Equal Employment Opportunity by and through the March 5, 2009 Document by way of USPS mail and through wire, radio, television and internet. As a result of the conspiracy, obstruction and deprivation, Tay suffers extreme and irreparable harm and is entitled to relief under titled section [1983].

**COUNT 105 - CONSPIRACY TO DEPRIVE RIGHTS**

**42 USC§ 1985(3)**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

947. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

948. Defendants conspired, obstructed and deprived Tay the right to a government free from corruption, fraud and dishonesty of his Self Made American Dream by and through the March 5, 2009 Document and through wire, radio, television and internet. As a result of the



conspiracy, obstruction and deprivation, Tay suffers extreme and irreparable harm and is entitled to relief under titled section [1983].

**COUNT 106 - CONSPIRACY TO DEPRIVE RIGHTS**  
**42 USC§ 1985(3)**

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**

949. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

950. Defendants conspired, obstructed and deprived Tay the right to a government free from corruption, fraud and dishonesty of a student and student - athlete by and through the March 5, 2009 Document and through wire, radio, television and internet. As a result of the conspiracy, obstruction and deprivation, Tay suffers extreme and irreparable harm and is entitled to relief under titled section [1983].

**COUNT 107 - CONSPIRACY TO DEPRIVE RIGHTS**  
**42 USC§ 1985(3)**

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**

951. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

952. Defendants conspired, obstructed and deprived Tay the right to a government free from corruption, fraud and dishonesty of an true and accurate drug test and or Chain of Custody for his drug test by and through the March 5, 2009 Document and through wire, radio, television and internet. As a result of the conspiracy, obstruction and deprivation, Tay suffers extreme and irreparable harm and is entitled to relief under titled section [1983].



**COUNT 108 - CONSPIRACY TO DEPRIVE RIGHTS**

**42 USC§ 1985(3)**

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**

953. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

954. Defendants conspired, obstructed and deprived Tay the right to a government free from corruption, fraud and dishonesty of the American Dream, the SNAP program and Equal Employment Opportunities in the State. As a result of the conspiracy, obstruction and deprivation, Tay suffers extreme and irreparable harm and is entitled to relief under titled section [1983] and 1981a pursuant to the March 5, 2009 Document and the Tay Tay Terror Attack.

**COUNT 109 - CONSPIRACY TO DEPRIVE RIGHTS**

**42 USC§ 1985(3)**

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**

955. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

956. Defendants conspired, obstructed and deprived Tay the right to a government free from corruption, fraud and dishonesty of owning a Hotmail Account. As a result of the conspiracy, obstruction and deprivation, Tay suffers extreme and irreparable harm and is entitled to relief under the titled section [1983].

**COUNT 110 - CONSPIRACY TO DEPRIVE RIGHTS**

**42 USC§ 1985(3)**

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**



957. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

958. Defendants conspired, obstructed and deprived Tay the right to a government free from corruption, fraud and dishonesty by illegally having Tay under surveillance with access to his property before and after February 9, 2009 pursuant to the herein *NSA Scheme* (See ¶139 – 150). As a result of the conspiracy, obstruction and deprivation, Tay suffers extreme and irreparable harm and is entitled to relief under the titled section [1983].

**COUNT 111 - CONSPIRACY TO DEPRIVE RIGHTS**  
**42 USC§ 1985(3)**

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**

959. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

960. Defendants conspired, obstructed and deprived Tay the right to a government free from corruption, fraud and dishonesty by illegally having Tay under surveillance with access to his property before and after February 9, 2009 pursuant to the herein *Education and Employment Scheme* . As a result of the conspiracy, obstruction and deprivation, Tay suffers extreme and irreparable harm and is entitled to relief under the titled section [1983].

**COUNT 112 - CONSPIRACY TO DEPRIVE RIGHTS**  
**42 USC§ 1985(3)**

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**

961. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.



962. Defendants conspired, obstructed and deprived Tay the right to a government free from corruption, fraud and dishonesty by illegally having Tay under surveillance with access to his property before and after February 9, 2009 pursuant to the herein *The United States Private Tutoring Scheme*. As a result of the conspiracy, obstruction and deprivation, Tay suffers extreme and irreparable harm and is entitled to relief under the titled section [1983].

**COUNT 113 - CONSPIRACY TO DEPRIVE RIGHTS**  
**42 USC§ 1985(3)**

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**

963. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

964. Defendants conspired, obstructed and deprived Tay the right to a government free from corruption, fraud and dishonesty by illegally having Tay under surveillance with access to his property before and after February 9, 2009 pursuant to the herein *Florida Illegal Gambling Scheme*. As a result of the conspiracy, obstruction and deprivation, Tay suffers extreme and irreparable harm and is entitled to relief under the titled section [1983].

**COUNT 114 - CONSPIRACY TO DEPRIVE RIGHTS**  
**42 USC§ 1985(3)**

**Under the Pinkerton Doctrine Conspiracy, Pinkerton v. United States, 328 U.S. 640 (1946)**

965. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

966. Defendants conspired, obstructed and deprived Tay the right to a government free from corruption, fraud and dishonesty by illegally having Tay under surveillance with access to his property before and after February 9, 2009 pursuant to the herein *Marijuana Discrimination*





*Scheme*. As a result of the conspiracy, obstruction and deprivation, Tay suffers extreme and irreparable harm and is entitled to relief under the titled section [1983].

**COUNT 115 - CONSPIRACY TO DEPRIVE RIGHTS**

**42 USC§ 1985(3)**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

967. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

968. Defendants conspired, obstructed and deprived Tay the right to a government free from corruption, fraud and dishonesty by illegally having Tay under surveillance with access to his property before and after February 9, 2009 pursuant to the herein *Delayed Justice Scheme*.

As a result of the conspiracy, obstruction and deprivation, Tay suffers extreme and irreparable harm and is entitled to relief under the titled section [1983].

**COUNT 116 - CONSPIRACY TO DEPRIVE RIGHTS**

**42 USC§ 1985(3)**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

969. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

970. Defendants conspired, obstructed and deprived Tay the right to a government free from corruption, fraud and dishonesty by illegally having Tay under surveillance with access to his property before and after February 9, 2009 pursuant to the herein *Defamation Scheme* in violation of and pursuant to Fla. Stat. § 784.048. As a result of the conspiracy, obstruction and deprivation, Tay suffers extreme and irreparable harm and is entitled to relief under the titled section [1983].

**COUNT 117 – MAJOR FRAUD AGAINST THE UNITED STATES**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**



971. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

972. Defendants knowingly executed, or attempted to execute the NSA Scheme with and or to obtain money and or property pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack and or the approximately \$52.6 billion “black budget”<sup>193</sup> including but not limited to \$4.3 billion in Conducting Cyber Operations such as the NSA Scheme and or MSN Scheme on, before and after February 9, 2009 pursuant to the March 5, 2009 Document by means of false and or fraudulent pretenses, representations, and or promises in any grant and or contract and or subcontract and or subsidy and or loan and or guarantee and or insurance or other form of Federal assistance, including through the Troubled Asset Relief Program, and or an economic stimulus, and or recovery or rescue plan provided by the Government, or the Government’s purchase of any troubled asset as defined in the Emergency Economic Stabilization Act of 2008, or in any procurement of property and services as a prime contractor with the United States and or as a subcontractor or supplier on a contract in which there is a prime contract with the United States, if the value of such grant, contract, subcontract, subsidy, loan, guarantee, insurance, or other form of federal assistance, or any constituents part thereof, is \$1 million or more.

**COUNT 118 – MAJOR FRAUD AGAINST THE UNITED STATES**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

973. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

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<sup>193</sup> Secret budget of the NSA. See <http://apps.washingtonpost.com/g/page/national/inside-the-2013-us-intelligence-black-budget/420/>.



974. Defendants knowingly executed, or attempted to execute the *Employment Education Scheme* with and or to over \$36.5 billion on, before and after February 9, 2009 and or property such as licensee software and hardware and or other property pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack such as the *NSA Scheme* and or *MSN Scheme* on, before and after February 9, 2009 pursuant to the March 5, 2009 Document by means of false and or fraudulent pretenses, representations, and or promises in any grant such as Race to the Top and or No Child Left Behind and or contract and or subcontract and or subsidy and or loan and or guarantee and or insurance or other form of Federal assistance such as education, including through the Troubled Asset Relief Program, and or an economic stimulus, and or recovery or rescue plan provided by the Government, or the Government's purchase of any troubled asset as defined in the Emergency Economic Stabilization Act of 2008, or in any procurement of property and services as a prime contractor with the United States and or as a subcontractor or supplier on a contract in which there is a prime contract with the United States, when the value of such grant, contract, subcontract, subsidy, loan, guarantee, insurance, or other form of federal assistance, or any constituents part thereof, is \$1 million or more on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

**COUNT 119 – MAJOR FRAUD AGAINST THE UNITED STATES**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

975. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

976. Defendants knowingly executed, or attempted to execute the NSA Scheme with and or to obtain money and or property pursuant to the March 5, 2009 Document and or the Tay Tay



Terror Attack and or the approximately \$52.6 billion “black budget”<sup>194</sup>, including but not limited to \$4.3 billion in Conducting Cyber Operations such as the NSA Scheme and or MSN Scheme on, before and after February 9, 2009 pursuant to the March 5, 2009 Document by means of false and or fraudulent pretenses, representations, and or promises in any grant and or contract and or subcontract and or subsidy and or loan and or guarantee and or insurance or other form of Federal assistance, including through the Troubled Asset Relief Program, and or an economic stimulus, and or recovery or rescue plan provided by the Government, or the Government’s purchase of any troubled asset as defined in the Emergency Economic Stabilization Act of 2008, or in any procurement of property and services as a prime contractor with the United States and or as a subcontractor or supplier on a contract in which there is a prime contract with the United States, if the value of such grant, contract, subcontract, subsidy, loan, guarantee, insurance, or other form of federal assistance, or any constituents part thereof, is \$1 million or more.

**COUNT 120 – FRAUD IN CONNECTION WITH MAJOR DISASTER OR  
EMERGENCY BENEFITS**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**  
977. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as

if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

978. Defendants in a circumstance where the authorization, transportation, transmission, transfer, disbursement or payment of the food stamp or SNAP benefit are in and or affects interstate or foreign commerce; and or the food stamp or SNAP benefit is transported in the mail at the authorization, transportation, transmission, transfer, disbursement, or payment of the food stamp and or SNAP benefit; and or Tay’s food stamp and or SNAP benefit is a

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<sup>194</sup> Secret budget of the NSA. See <http://apps.washingtonpost.com/g/page/national/inside-the-2013-us-intelligence-black-budget/420/>.



record, voucher, payment and or anything value of the United States, and or any department or agency thereof knowingly falsified, concealed, and or covered up by the *Food Stamp Scheme* on, before and after February 9, 2009 pursuant to the March 5, 2009 Document the material fact of an equal employment opportunity on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or made Tay's food stamp notice materially false, fictitious, and or fraudulent statement and or representation, and or made and or used any false writing and or document knowing the same to contain any materially false, fictitious, or fraudulent statement or representation in Tay's matter on, before and after February 9, 2009 pursuant to the March 5, 2009 Document involving his food stamps which were authorized, transported, transmitted, transferred, disbursed, or paid in connection with Tay's livelihood and or the March 5, 2009 Document and or the Tay Tay Terror Attack pursuant to Fl. Stat. § 409.18 ("Social and Economic Assistance") including but not limited to Fl. Stat § 409. 901 ("Medicaid") and not being eligible to receive monetary assistance and or adequate medical coverage's.

979. Pursuant to FL. Stat. § 420.0003 ("State Housing Strategy"), by 2010, the Defendants and or RICO Defendants failed to ensure decent and affordable housing to Tay pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack, which therefore created Tay's livelihood wherefore Defendants forced Tay into Food Stamp Trafficking for survival while benefitting from Tay through the Food Stamp Scheme on, before and after February 9, 2009.

**COUNT 121 – DOMESTIC TERRORISM**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

As defined in 18 USC § 2331(5)(A) pursuant to and in violation of 18 USC §§ 1341, 1346 referring to the herein March 5, 2009 Document

[All Defendants and or RICO Defendants, excluding any and or all agencies of the United States, or any officer or employee of the United States or any agency thereof acting within his or her



official capacity or under color of legal authority; or a foreign state, an agency of a foreign state, or an officer or employee of a foreign state or an agency thereof acting within his or her official capacity or under color of legal authority pursuant to 18 USC § 2337(“Suits against Government Officials”].

980. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

981. Pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack, Defendants and or RICO Defendants involved fraudulent civil and criminal acts that are dangerous to Tay’s human life and or Tay’s livelihood which are violation of the criminal laws in the United States and or of any state, including the State which appear to be intended to influence the Equal Employment Opportunity policy pursuant to Fl. Stat. 112. 0455 by intimidation and or coercion and occurred primarily within the territorial jurisdiction of the United States, including but not limited to the State.

982. Defendants and or RICO Defendants having devised the Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to the March 5, 2009 Document to defraud Tay and or the United States, and or for obtaining money or property by means of false and or fraudulent pretenses, representations, or promises, or to sell, dispose of, loan, exchange, alter, give away, distribute, supply, or furnish or procure for unlawful use the March 5, 2009 Document for the purpose of executing the Tay Tay Terror Attack in the United States post office or any matter of thing whatever to be sent and delivered by the Postal Service to deprive Tay of the intangible right of honest services pursuant to his Self Made American Dream and or the March 5, 2009 Document on, before and or after February 9, 2009 pursuant to the March 5, 2009 Document.



983. Therefore with reckless disregard for the risk that Tay will be placed in danger and or bodily injury under circumstances manifesting extreme indifference to such risk, tampered with Tay's drug test or his Florida Chain of Custody form, and or his Equal Employment Opportunity and or his Self Made American Dream on, before and after February 9, 2009 pursuant to the March 5, 2009 Document which affects interstate and or foreign commerce, and or the labeling of, or container of Tay's drug test or his Florida Chain of Custody form, and or his Equal Employment Opportunity and or his Self Made American Dream and or attempted to do so. Wherefore, with intent to cause serious injury to the business of Tay, taints Tay's drug test or his Florida Chain of Custody form, and or his Equal Employment Opportunity and or his Self Made American Dream on, before and after February 9, 2009 pursuant to the March 5, 2009 Document, and or rendered materially false or misleading the labeling of Tay's drug test or his Florida Chain of Custody form, and or his Equal Employment Opportunity and or his Self Made American Dream on, before and after February 9, 2009 pursuant to the March 5, 2009 Document, and or container for Tay's drug test or his Florida Chain of Custody form, and or his Equal Employment Opportunity and or his Self Made American Dream on, before and after February 9, 2009 pursuant to the March 5, 2009 Document in violation and pursuant to 18 USC § 1365 ("Tampering With Consumer Products").

984. Therefore, holding and or returning Tay to Poverty Prison and or Tay's livelihood, and or attempts to arrests Tay with the intent of placing him in or returning him to a condition of peonage in violation of and pursuant to 18 USC § 1581 ("Peonage").

985. Therefore knowingly and willfully, and or conspiring to hold Tay to involuntary servitude as poverty participant and or sold Tay into the condition of Prison Poverty on,



before and after February 9, 2009 pursuant to Tay's drug test or his Florida Chain of Custody form, and or his Equal Employment Opportunity and or his Self Made American Dream on, before and after February 9, 2009 pursuant to the March 5, 2009 Document pursuant to 18 USC § 1584 ("Sale into involuntary servitude").

986. Wherefore knowingly providing and or obtaining the labor and or services of Tay by means of force as referenced *supra*, and or threats of force as referenced *supra*, and or physical restrain as referenced *supra*, to Tay and by means of serious harm and or threats of serious harm to Tay and or the public as referenced and hereinafter incorporated, *supra* ¶ 1 – 977, and or by means of the abuse and or threatened abuse of law or legal process, as referred to in the *Delayed Justice Scheme* pursuant to the herein Tay Tay Terror Attack, and or by means of the Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or any scheme, plan or pattern intended to cause Tay to believe that, if he did not perform within the education, entertainment, employment and or entrepreneurship curriculum and or any scheme, plan or pattern intended to allegedly give Tay equal opportunity to obtain and acquire his Self Made American Dream, he would suffer serious harm and or physical restraint such as, Tay's livelihood on, before and after February 9, 2009 pursuant to the March 5, 2009 Document. Wherefore knowingly benefitting, financially or by receiving anything of value from participation in any and all ventures which has engaged in the providing or obtaining of education, entertainment, religious, employment and entrepreneurship labor or services of Tay knowing and or in reckless disregard of the fact that the venture has engaged in the providing or obtaining education, entertainment, religious, employment and entrepreneurship labor or services of Tay by means of the Tay





Tay Terror Attack on, before and after February 9, 2009 pursuant to the March 5, 2009

Document and or the Tay Tay Terror Attack in violation and pursuant to 18 USC § 1589.

987. Wherefore knowingly recruited, harbored, transported, provided and or obtained by means of education, entertainment, religious, employment and entrepreneurship labor or services of Tay knowing and or in reckless disregard of the fact that the venture has engaged in the providing or obtaining education, entertainment, religious, employment and entrepreneurship labor or services of Tay by means of the Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack in violation and pursuant to 18 USC § 1590.

988. Wherefore Defendants and or RICO Defendants knowingly destroyed, concealed, removed, confiscated and or possesses or possessed Tay's drug test or his Florida Chain of Custody form from February 23, 2009, and or his Equal Employment Opportunity and or his Self Made American Dream on, before and after February 9, 2009 pursuant to the March 5, 2009 Document in the course of a violation(s) of 18 USC §§ 1581, 1584, 1589, 1590 and or 1594(a) and or with intent to violate 18 USC §§ 1581, 1584, 1589 and 1590 and or to prevent or restrict and or attempt to prevent and or restrict, without lawful authority, Tay's liberty to move and or travel on, before and after February 9, 2009 pursuant to the March 5, 2009 Document, when Tay is or has been a victim of a severe form of trafficking, as defined in § 103 of the Trafficking Victims Protection Act of 2000 pursuant to and in violation of 18 USC § 1592. Pursuant to 18 USC § 1592(b) this and or any other section, code and or administrative law applies to Tay due to the misleading and slavery conduct caused by, and or incident to the herein trafficking of Tay.



989. Therefore knowingly benefits, financially and or by receiving anything of value, such as Tay's Data Info, from participation in the Tay Tay Terror Attack which has engaged in any act in violation of 18 USC §1581(a) and or 1592 and or 1595(a), knowing and or in reckless disregard of the fact that the Tay Tay Terror Attack has engaged in such violation(s) pursuant to 18 USC § 1593A.

990. Tay is hereinafter a victim of severe forms of trafficking and or a victim of trafficking pursuant to the Trafficking Victims Protection Act of 2000 § 103(13) and (14) through an act of war as declared and pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack in the course of Defendants and or RICO Defendants violation(s) of 18 USC §§ 1581, 1584, 1589, 1590 and or 1594(a) and or with intent to violate 18 USC §§ 1581, 1584, 1589 and 1590.

991. Tay has jurisdiction of this claim and is due relief pursuant to 18 USC § 2333(a) ("Civil Remedies") and 18 USC § 1593(2)(3) ("Mandatory Restitution") and 18 USC § 1595 ("Civil Remedy").

#### **COUNT 122 – PEONAGE**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

992. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

993. Pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack, Defendants and or RICO Defendants involved act dangerous to Tay's human life and or Tay's livelihood which are violation of the criminal laws in the United States and or of any state, including the State which appear to be intended to influence the Equal Employment Opportunity policy



pursuant to Fl. Stat. 112. 0455 by intimidation and or coercion and occurred primarily within the territorial jurisdiction of the United States, including but not limited to the State.

994. Defendants and or RICO Defendants having devised the *MSN Hotmail Scheme* and or the Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to the March 5, 2009 Document to defraud Tay and or the United States, and or for obtaining money or property by means of false and or fraudulent pretenses, representations, or promises, or to sell, dispose of, loan, exchange, alter, give away, distribute, supply, or furnish or procure for unlawful use the March 5, 2009 Document for the purpose of executing the Tay Tay Terror Attack in the United States post office or any matter of thing whatever to be sent and delivered by the Postal Service to deprive Tay of the intangible right of honest services pursuant to his Self Made American Dream and or the March 5, 2009 Document on, before and or after February 9, 2009 pursuant to the March 5, 2009 Document.

995. Therefore, holding and or returning Tay to Poverty Prison and or Tay's livelihood, and or attempts to arrests Tay with the intent of placing him in or returning him to a condition of peonage in violation of and pursuant to 18 USC § 1581 ("Peonage").

996. Therefore knowingly benefits, financially and or by receiving anything of value, such as Tay's Data Info, from participation in the Tay Tay Terror Attack which has engaged in any act in violation of 18 USC §1581(a) and or 1592 and or 1595(a), knowing and or in reckless disregard of the fact that the Tay Tay Terror Attack has engaged in such violation(s) pursuant to 18 USC § 1593A.

997. Tay is hereinafter a victim of severe forms of trafficking and or a victim of trafficking pursuant to the Trafficking Victims Protection Act of 2000 § 103(13) and (14) through an act of war as declared and pursuant to the March 5, 2009 Document and or the Tay Tay Terror



Attack in the course of Defendants and or RICO Defendants violation(s) of 18 USC §§ 1581, 1584, 1589, 1590 and or 1594(a) and or with intent to violate 18 USC §§ 1581, 1584, 1589 and 1590.

998. Tay has jurisdiction of this claim and is due relief pursuant to 18 USC § 2333(a) (“Civil Remedies”) and 18 USC § 1593(2)(3) (“Mandatory Restitution”) and 18 USC § 1595 (“Civil Remedy”).

**COUNT 123 – PEONAGE**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

999. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

1000. Pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack, Defendants and or RICO Defendants involved act dangerous to Tay’s human life and or Tay’s livelihood which are violation of the criminal laws in the United States and or of any state, including the State which appear to be intended to influence the Equal Employment Opportunity policy pursuant to Fl. Stat. 112. 0455 by intimidation and or coercion and occurred primarily within the territorial jurisdiction of the United States, including but not limited to the State.

1001. Defendants and or RICO Defendants having devised the *NSA Scheme* and or the Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to the March 5, 2009 Document to defraud Tay and or the United States, and or for obtaining money or property by means of false and or fraudulent pretenses, representations, or promises, or to sell, dispose of, loan, exchange, alter, give away, distribute, supply, or furnish or procure for unlawful use the March 5, 2009 Document for the purpose of executing the Tay Tay Terror Attack in the United States post office or any matter of thing whatever to be sent and delivered by the



Postal Service to deprive Tay of the intangible right of honest services pursuant to his Self Made American Dream and or the March 5, 2009 Document on, before and or after February 9, 2009 pursuant to the March 5, 2009 Document.

1002. Therefore, holding and or returning Tay to Poverty Prison and or Tay's livelihood, and or attempts to arrests Tay with the intent of placing him in or returning him to a condition of peonage in violation of and pursuant to 18 USC § 1581 ("Peonage").

1003. Therefore knowingly benefits, financially and or by receiving anything of value, such as Tay's Data Info, from participation in the Tay Tay Terror Attack which has engaged in any act in violation of 18 USC §1581(a) and or 1592 and or 1595(a), knowing and or in reckless disregard of the fact that the Tay Tay Terror Attack has engaged in such violation(s) pursuant to 18 USC § 1593A.

1004. Tay is hereinafter a victim of severe forms of trafficking and or a victim of trafficking pursuant to the Trafficking Victims Protection Act of 2000 § 103(13) and (14) through an act of war as declared and pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack in the course of Defendants and or RICO Defendants violation(s) of 18 USC §§ 1581, 1584, 1589, 1590 and or 1594(a) and or with intent to violate 18 USC §§ 1581, 1584, 1589 and 1590.

1005. Tay has jurisdiction of this claim and is due relief pursuant to 18 USC § 2333(a) ("Civil Remedies") and 18 USC § 1593(2)(3) ("Mandatory Restitution") and 18 USC § 1595 ("Civil Remedy").

**COUNT 124 – PEONAGE**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**



1006. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.
1007. Pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack, Defendants and or RICO Defendants involved act dangerous to Tay's human life and or Tay's livelihood which are violation of the criminal laws in the United States and or of any state, including the State which appear to be intended to influence the Equal Employment Opportunity policy pursuant to Fl. Stat. 112. 0455 by intimidation and or coercion and occurred primarily within the territorial jurisdiction of the United States, including but not limited to the State.
1008. Defendants and or RICO Defendants having devised the *Education and Employment Scheme*, and or the Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to the March 5, 2009 Document to defraud Tay and or the United States, and or for obtaining money or property by means of false and or fraudulent pretenses, representations, or promises, or to sell, dispose of, loan, exchange, alter, give away, distribute, supply, or furnish or procure for unlawful use the March 5, 2009 Document for the purpose of executing the Tay Tay Terror Attack in the United States post office or any matter of thing whatever to be sent and delivered by the Postal Service to deprive Tay of the intangible right of honest services pursuant to his Self Made American Dream and or the March 5, 2009 Document on, before and or after February 9, 2009 pursuant to the March 5, 2009 Document.
1009. Therefore, holding and or returning Tay to Poverty Prison and or Tay's livelihood, and or attempts to arrests Tay with the intent of placing him in or returning him to a condition of peonage in violation of and pursuant to 18 USC § 1581 ("Peonage").



1010. Therefore knowingly benefits, financially and or by receiving anything of value, such as Tay's Data Info, from participation in the Tay Tay Terror Attack which has engaged in any act in violation of 18 USC §1581(a) and or 1592 and or 1595(a), knowing and or in reckless disregard of the fact that the Tay Tay Terror Attack has engaged in such violation(s) pursuant to 18 USC § 1593A.

1011. Tay is hereinafter a victim of severe forms of trafficking and or a victim of trafficking pursuant to the Trafficking Victims Protection Act of 2000 § 103(13) and (14) through an act of war as declared and pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack in the course of Defendants and or RICO Defendants violation(s) of 18 USC §§ 1581, 1584, 1589, 1590 and or 1594(a) and or with intent to violate 18 USC §§ 1581, 1584, 1589 and 1590.

1012. Tay has jurisdiction of this claim and is due relief pursuant to 18 USC § 2333(a) ("Civil Remedies") and 18 USC § 1593(2)(3) ("Mandatory Restitution") and 18 USC § 1595 ("Civil Remedy").

**COUNT 125 – PEONAGE**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

1013. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

1014. Pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack, Defendants and or RICO Defendants involved act dangerous to Tay's human life and or Tay's livelihood which are violation of the criminal laws in the United States and or of any state, including the State which appear to be intended to influence the Equal Employment Opportunity policy



pursuant to Fl. Stat. 112. 0455 by intimidation and or coercion and occurred primarily within the territorial jurisdiction of the United States, including but not limited to the State.

1015. Defendants and or RICO Defendants having devised *The United States Private Tutoring Scheme*, and or the Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to the March 5, 2009 Document to defraud Tay and or the United States, and or for obtaining money or property by means of false and or fraudulent pretenses, representations, or promises, or to sell, dispose of, loan, exchange, alter, give away, distribute, supply, or furnish or procure for unlawful use the March 5, 2009 Document for the purpose of executing the Tay Tay Terror Attack in the United States post office or any matter of thing whatever to be sent and delivered by the Postal Service to deprive Tay of the intangible right of honest services pursuant to his Self Made American Dream and or the March 5, 2009 Document on, before and or after February 9, 2009 pursuant to the March 5, 2009 Document.

1016. Therefore, holding and or returning Tay to Poverty Prison and or Tay's livelihood, and or attempts to arrests Tay with the intent of placing him in or returning him to a condition of peonage in violation of and pursuant to 18 USC § 1581 ("Peonage").

1017. Therefore knowingly benefits, financially and or by receiving anything of value, such as Tay's Data Info, from participation in the Tay Tay Terror Attack which has engaged in any act in violation of 18 USC §1581(a) and or 1592 and or 1595(a), knowing and or in reckless disregard of the fact that the Tay Tay Terror Attack has engaged in such violation(s) pursuant to 18 USC § 1593A.

1018. Tay is hereinafter a victim of severe forms of trafficking and or a victim of trafficking pursuant to the Trafficking Victims Protection Act of 2000 § 103(13) and (14) through an act of war as declared and pursuant to the March 5, 2009 Document and or the Tay Tay Terror





Attack in the course of Defendants and or RICO Defendants violation(s) of 18 USC §§ 1581, 1584, 1589, 1590 and or 1594(a) and or with intent to violate 18 USC §§ 1581, 1584, 1589 and 1590.

1019. Tay has jurisdiction of this claim and is due relief pursuant to 18 USC § 2333(a) (“Civil Remedies”) and 18 USC § 1593(2)(3) (“Mandatory Restitution”) and 18 USC § 1595 (“Civil Remedy”).

**COUNT 126 – PEONAGE**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**  
1020. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as

if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

1021. Pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack, Defendants and or RICO Defendants involved act dangerous to Tay’s human life and or Tay’s livelihood which are violation of the criminal laws in the United States and or of any state, including the State which appear to be intended to influence the Equal Employment Opportunity policy pursuant to Fl. Stat. 112. 0455 by intimidation and or coercion and occurred primarily within the territorial jurisdiction of the United States, including but not limited to the State.

1022. Defendants and or RICO Defendants having devised the *Food Stamp Scheme*, and or the Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to the March 5, 2009 Document to defraud Tay and or the United States, and or for obtaining money or property by means of false and or fraudulent pretenses, representations, or promises, or to sell, dispose of, loan, exchange, alter, give away, distribute, supply, or furnish or procure for unlawful use the March 5, 2009 Document for the purpose of executing the Tay Tay Terror Attack in the United States post office or any matter of thing whatever to be sent and delivered by the



Postal Service to deprive Tay of the intangible right of honest services pursuant to his Self Made American Dream and or the March 5, 2009 Document on, before and or after February 9, 2009 pursuant to the March 5, 2009 Document.

1023. Therefore, holding and or returning Tay to Poverty Prison and or Tay's livelihood, and or attempts to arrests Tay with the intent of placing him in or returning him to a condition of peonage in violation of and pursuant to 18 USC § 1581 ("Peonage").

1024. Therefore knowingly benefits, financially and or by receiving anything of value, such as Tay's Data Info, from participation in the Tay Tay Terror Attack which has engaged in any act in violation of 18 USC §1581(a) and or 1592 and or 1595(a), knowing and or in reckless disregard of the fact that the Tay Tay Terror Attack has engaged in such violation(s) pursuant to 18 USC § 1593A.

1025. Tay is hereinafter a victim of severe forms of trafficking and or a victim of trafficking pursuant to the Trafficking Victims Protection Act of 2000 § 103(13) and (14) through an act of war as declared and pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack in the course of Defendants and or RICO Defendants violation(s) of 18 USC §§ 1581, 1584, 1589, 1590 and or 1594(a) and or with intent to violate 18 USC §§ 1581, 1584, 1589 and 1590.

1026. Tay has jurisdiction of this claim and is due relief pursuant to 18 USC § 2333(a) ("Civil Remedies") and 18 USC § 1593(2)(3) ("Mandatory Restitution") and 18 USC § 1595 ("Civil Remedy").

**COUNT 127 – PEONAGE**  
**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**



1027. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

1028. Pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack, Defendants and or RICO Defendants involved act dangerous to Tay's human life and or Tay's livelihood which are violation of the criminal laws in the United States and or of any state, including the State which appear to be intended to influence the Equal Employment Opportunity policy pursuant to Fl. Stat. 112. 0455 by intimidation and or coercion and occurred primarily within the territorial jurisdiction of the United States, including but not limited to the State.

1029. Defendants and or RICO Defendants having devised the *Marijuana Scheme* and or the Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to the March 5, 2009 Document to defraud Tay and or the United States, and or for obtaining money or property by means of false and or fraudulent pretenses, representations, or promises, or to sell, dispose of, loan, exchange, alter, give away, distribute, supply, or furnish or procure for unlawful use the March 5, 2009 Document for the purpose of executing the Tay Tay Terror Attack in the United States post office or any matter of thing whatever to be sent and delivered by the Postal Service to deprive Tay of the intangible right of honest services pursuant to his Self Made American Dream and or the March 5, 2009 Document on, before and or after February 9, 2009 pursuant to the March 5, 2009 Document.

1030. Therefore, holding and or returning Tay to Poverty Prison and or Tay's livelihood, and or attempts to arrests Tay with the intent of placing him in or returning him to a condition of peonage in violation of and pursuant to 18 USC § 1581 ("Peonage").



1031. Therefore knowingly benefits, financially and or by receiving anything of value, such as Tay's Data Info, from participation in the Tay Tay Terror Attack which has engaged in any act in violation of 18 USC §1581(a) and or 1592 and or 1595(a), knowing and or in reckless disregard of the fact that the Tay Tay Terror Attack has engaged in such violation(s) pursuant to 18 USC § 1593A.

1032. Tay is hereinafter a victim of severe forms of trafficking and or a victim of trafficking pursuant to the Trafficking Victims Protection Act of 2000 § 103(13) and (14) through an act of war as declared and pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack in the course of Defendants and or RICO Defendants violation(s) of 18 USC §§ 1581, 1584, 1589, 1590 and or 1594(a) and or with intent to violate 18 USC §§ 1581, 1584, 1589 and 1590.

1033. Tay has jurisdiction of this claim and is due relief pursuant to 18 USC § 2333(a) ("Civil Remedies") and 18 USC § 1593(2)(3) ("Mandatory Restitution") and 18 USC § 1595 ("Civil Remedy").

#### **COUNT 128 – PEONAGE**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

1034. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

1035. Pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack, Defendants and or RICO Defendants involved act dangerous to Tay's human life and or Tay's livelihood which are violation of the criminal laws in the United States and or of any state, including the State which appear to be intended to influence the Equal Employment Opportunity policy



pursuant to Fl. Stat. 112. 0455 by intimidation and or coercion and occurred primarily within the territorial jurisdiction of the United States, including but not limited to the State.

1036. Defendants and or RICO Defendants having devised the *Delayed Justice Scheme*, and or the Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to the March 5, 2009 Document to defraud Tay and or the United States, and or for obtaining money or property by means of false and or fraudulent pretenses, representations, or promises, or to sell, dispose of, loan, exchange, alter, give away, distribute, supply, or furnish or procure for unlawful use the March 5, 2009 Document for the purpose of executing the Tay Tay Terror Attack in the United States post office or any matter of thing whatever to be sent and delivered by the Postal Service to deprive Tay of the intangible right of honest services of the judicial and or legal process pursuant to the April Fool's Order and or his Self Made American Dream and or the March 5, 2009 Document on, before and or after February 9, 2009 pursuant to the March 5, 2009 Document.

1037. Therefore, holding and or returning Tay to Poverty Prison and or Tay's livelihood, and or attempts to arrests Tay with the intent of placing him in or returning him to a condition of peonage in violation of and pursuant to 18 USC § 1581 ("Peonage").

1038. Therefore knowingly benefits, financially and or by receiving anything of value, such as Tay's Data Info, from participation in the Tay Tay Terror Attack which has engaged in any act in violation of 18 USC §1581(a) and or 1592 and or 1595(a), knowing and or in reckless disregard of the fact that the Tay Tay Terror Attack has engaged in such violation(s) pursuant to 18 USC § 1593A.

1039. Tay is hereinafter a victim of severe forms of trafficking and or a victim of trafficking pursuant to the Trafficking Victims Protection Act of 2000 § 103(13) and (14) through an act



of war as declared and pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack in the course of Defendants and or RICO Defendants violation(s) of 18 USC §§ 1581, 1584, 1589, 1590 and or 1594(a) and or with intent to violate 18 USC §§ 1581, 1584, 1589 and 1590.

1040. Tay has jurisdiction of this claim and is due relief pursuant to 18 USC § 2333(a) (“Civil Remedies”) and 18 USC § 1593(2)(3) (“Mandatory Restitution”) and 18 USC § 1595 (“Civil Remedy”).

**COUNT 129 – PEONAGE**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

1041. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

1042. Pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack, Defendants and or RICO Defendants involved act dangerous to Tay’s human life and or Tay’s livelihood which are violation of the criminal laws in the United States and or of any state, including the State which appear to be intended to influence the Equal Employment Opportunity policy pursuant to Fl. Stat. 112. 0455 by intimidation and or coercion and occurred primarily within the territorial jurisdiction of the United States, including but not limited to the State.

1043. Defendants and or RICO Defendants having devised the *Florida Illegal Gambling Scheme* and or the Tay Tay Terror Attack on, before and after February 9, 2009 pursuant to the March 5, 2009 Document to defraud Tay and or the United States, and or for obtaining money or property by means of false and or fraudulent pretenses, representations, or promises, or to sell, dispose of, loan, exchange, alter, give away, distribute, supply, or furnish or procure for unlawful use the March 5, 2009 Document for the purpose of executing the



Tay Tay Terror Attack in the United States post office or any matter of thing whatever to be sent and delivered by the Postal Service to deprive Tay of the intangible right of honest services pursuant to his Self Made American Dream and or the March 5, 2009 Document on, before and or after February 9, 2009 pursuant to the March 5, 2009 Document.

1044. Therefore, holding and or returning Tay to Poverty Prison and or Tay's livelihood, and or attempts to arrests Tay with the intent of placing him in or returning him to a condition of peonage in violation of and pursuant to 18 USC § 1581 ("Peonage").

1045. Therefore knowingly benefits, financially and or by receiving anything of value, such as Tay's Data Info, from participation in the Tay Tay Terror Attack which has engaged in any act in violation of 18 USC §1581(a) and or 1592 and or 1595(a), knowing and or in reckless disregard of the fact that the Tay Tay Terror Attack has engaged in such violation(s) pursuant to 18 USC § 1593A.

1046. Tay is hereinafter a victim of severe forms of trafficking and or a victim of trafficking pursuant to the Trafficking Victims Protection Act of 2000 § 103(13) and (14) through an act of war as declared and pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack in the course of Defendants and or RICO Defendants violation(s) of 18 USC §§ 1581, 1584, 1589, 1590 and or 1594(a) and or with intent to violate 18 USC §§ 1581, 1584, 1589 and 1590.

1047. Tay has jurisdiction of this claim and is due relief pursuant to 18 USC § 2333(a) ("Civil Remedies") and 18 USC § 1593(2)(3) ("Mandatory Restitution") and 18 USC § 1595 ("Civil Remedy").

**COUNT 130 – EQUAL RIGHTS UNDER THE LAW**  
**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**



1048. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.
1049. Under Section 1981(a) Statement of equal rights; Tay within the jurisdiction of the United States, and or the State shall have the same right in the State and Territory of the United States to make and enforce contracts, to sue, be parties, give evidence, and to the full and equal benefit of all laws and proceedings for the security of persons and property as is enjoyed by white citizens, and shall be subject to like punishment, pains, penalties, taxes, licenses, and exactions of every kind, and to no other.
1050. On, before and after February 9, 2009, the Defendants and or RICO Defendants targeted Tay to discriminate against him from receiving any public employment in Brevard County, the State and or the United States because Tay is [Rastafari – Christian] a spiritual and or religious who may or may not have smoked marijuana on, before or after February 9, 2009, a educated black male under the age of 25 who is ugh Florida Boss, single with no children, from a poor household and neighborhood living in hostile environment on food stamps with no financial assistance. [hereinafter, “Target Discrimination”]
1051. Defendants and or RICO Defendants used Target Discrimination to deprive Tay the right to make and enforce his Equal Employment Opportunity for a substitute teacher contract and to the full benefit of all laws and proceedings for the security of Tay and his property as is enjoyed by white applicants for employment and or employment as a substitute teacher with the School Board on, before and after February 9, 2009 pursuant to the *Employment and Education Scheme* and or Tay Tay Terror Attack and shall be subject to like punishments, pains, penalties, taxes and exactions as a substitute teacher with the School Board who may





and or may not have failed a drug test pursuant to marijuana on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or *Employment and Education Scheme* and or Tay Tay Terror Attack. Tay suffers damages as a result of the harm done to Tay and is therefore due relief under 42 USC § 1981A.

**COUNT 131 – EQUAL RIGHTS UNDER THE LAW**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**  
1052. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as

if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

1053. Under Section 1981(a) Statement of equal rights; Tay within the jurisdiction of the United States, and or the State shall have the same right in the State and Territory of the United States to make and enforce contracts, to sue, be parties, give evidence, and to the full and equal benefit of all laws and proceedings for the security of persons and property as is enjoyed by white citizens, and shall be subject to like punishment, pains, penalties, taxes, licenses, and exactions of every kind, and to no other.

1054. Defendants and or RICO Defendants used Target Discrimination to deprive Tay the right to make and enforce an Equal Employment Opportunity for a substitute teacher contract pursuant to Tay's drug test and or Florida Chain of Custody form pursuant to Fl. Stat. 112.0455 and Fl. Stat. 440. 102 and to the full benefit of all laws and proceedings for the security of Tay and his property pursuant to Fl. Stat. 112.0455 and Fl. Stat. 440. 102 as is enjoyed by white male and or female applicants for employment and or employment as a substitute teacher with the School Board who may and or may not have failed a drug test pursuant to marijuana on, before and after February 9, 2009 pursuant to the *Employment and Education Scheme* and or Tay Tay Terror Attack and shall be subject to like punishments,



pains, penalties, taxes and exactions as a substitute teacher with the School Board on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or *Employment and Education Scheme* and or Tay Tay Terror Attack. Tay suffers damages as a result of the harm done to Tay and is therefore due relief under 42 USC § 1981A.

**COUNT 132 - EQUAL RIGHTS UNDER THE LAW**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

1055. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

1056. Under Section 1981(a) Statement of equal rights; Tay within the jurisdiction of the United States, and or the State shall have the same right in the State and Territory of the United States to make and enforce contracts, to sue, be parties, give evidence, and to the full and equal benefit of all laws and proceedings for the security of persons and property as is enjoyed by white citizens, and shall be subject to like punishment, pains, penalties, taxes, licenses, and exactions of every kind, and to no other.

1057. Defendants and or RICO Defendants used Target Discrimination to deprive Tay the right to sue as a suffering pro se, indigent plaintiff who may inartistically authored a complaint [Delayed Justice Scheme] pursuant to make and enforce an Equal Employment Opportunity for a substitute teacher contract pursuant to Tay's drug test and or Florida Chain of Custody form pursuant to Fl. Stat. 112.0455 and Fl. Stat. 440. 102 and to the full benefit of all laws and proceedings for the security of Tay and his property pursuant to Fl. Stat. 112.0455 and Fl. Stat. 440. 102 as is enjoyed by white male and or female applicants for employment and or employment as a substitute teacher with the School Board who may and or may not have failed a drug test pursuant to marijuana on, before and after February 9, 2009 pursuant to the



*Employment and Education Scheme* and or Tay Tay Terror Attack and shall be subject to like punishments, pains, penalties, taxes and exactions as a substitute teacher with the School Board on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or *Employment and Education Scheme* and or Tay Tay Terror Attack. Tay suffers damages as a result of the harm done to Tay and is therefore due relief under 42 USC § 1981A.

**COUNT 133 - EQUAL RIGHTS UNDER THE LAW**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**  
1058. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as

if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

1059. Under Section 1981(a) Statement of equal rights; Tay within the jurisdiction of the United States, and or the State shall have the same right in the State and Territory of the United States to make and enforce contracts, to sue, be parties, give evidence, and to the full and equal benefit of all laws and proceedings for the security of persons and property as is enjoyed by white citizens, and shall be subject to like punishment, pains, penalties, taxes, licenses, and exactions of every kind, and to no other.

1060. On, before and after February 9, 2009, the Defendants and or RICO Defendants targeted Tay to discriminate against him from receiving any public employment in Brevard County, the State and or the United States because Tay is [Rastafari – Christian] a spiritual and or religious, educated black male under the age of 25 who are ugh Florida Boss, single with no children, from a poor household and neighborhood living in hostile environment on food stamps with no financial assistance.

1061. Defendants and or RICO Defendants deprived Tay the right to an Equal Employment Opportunity contract and to the full benefit of all laws and proceedings for the security of



Tay and his property as is enjoyed by white applicants for employment and or employment as a substitute teacher with the School Board on, before and after February 9, 2009 pursuant to the *Employment and Education Scheme* and or Tay Tay Terror Attack and shall be subject to like punishments, pains, penalties, taxes and exactions as a substitute teacher with the School Board on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or *Employment and Education Scheme* and or Tay Tay Terror Attack. Tay suffers damages as a result of the harm done to Tay and is therefore due relief under 42 USC § 1981A.

**COUNT 134 - EQUAL RIGHTS UNDER THE LAW**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**  
1062. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as

if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

1063. Under Section 1981(a) Statement of equal rights; Tay within the jurisdiction of the United States, and or the State shall have the same right in the State and Territory of the United States to make and enforce contracts, to sue, be parties, give evidence, and to the full and equal benefit of all laws and proceedings for the security of persons and property as is enjoyed by white citizens, and shall be subject to like punishment, pains, penalties, taxes, licenses, and exactions of every kind, and to no other.

1064. Defendants and or RICO Defendants used Target Discrimination to deprive Tay the right to sue as a suffering pro se, indigent plaintiff who may inartistically authored a complaint [*Delayed Justice Scheme*] pursuant to make and enforce an Equal Employment Opportunity for a substitute teacher contract pursuant to Tay's drug test and or Florida Chain of Custody form pursuant to Fl. Stat. 112.0455 and Fl. Stat. 440. 102 and to the full benefit of all laws



and proceedings for the security of Tay and his property pursuant to Federal Rules of Civil Procedure as is enjoyed by white male and or female pro se, indigent plaintiff's who were applicants and or a applicant for employment and or employment as a substitute teacher with the School Board who may and or may not have failed a drug test pursuant to marijuana on, before and after February 9, 2009 pursuant to the *Delayed Justice Scheme* and thereafter the April Fool's Order, and or the *Employment and Education Scheme* and or Tay Tay Terror Attack and shall be subject to like punishments, pains, penalties, taxes and exactions as a Pro Se litigator thereafter the April Fool's Order pursuant to make and enforce his contract for a substitute teacher with the School Board on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or *Employment and Education Scheme* and or Tay Tay Terror Attack. Tay suffers damages as a result of the harm done to Tay and is therefore due relief under 42 USC § 1981A.

**COUNT 135 - EQUAL RIGHTS UNDER THE LAW**

**Pursuant to 18 USC § 1346 and 42 USC § 1981**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**  
1065. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

1066. Under Section 1981(a) Statement of equal rights; Tay within the jurisdiction of the United States, and or the State shall have the same right in the State and Territory of the United States to make and enforce contracts, to sue, be parties, give evidence, and to the full and equal benefit of all laws and proceedings for the security of persons and property as is enjoyed by white citizens, and shall be subject to like punishment, pains, penalties, taxes, licenses, and exactions of every kind, and to no other.



1067. Defendants and or RICO Defendants used Target Discrimination to deprive Tay the intangible right to his Self Made American Dream of honest Equal Employment Opportunity services on about March 5, 2009 using mail and wires in violation of 18 USC §§ 1341 and 1343 to deprive Tay his right to honest services of an Equal Employment Opportunity pursuant to make and enforce an Equal Employment Opportunity for a substitute teacher contract pursuant to Tay's drug test and or Florida Chain of Custody form pursuant to Fl. Stat. 112.0455 and Fl. Stat. 440. 102 and to the full benefit of all laws and proceedings for the security of Tay and his property pursuant to Fl. Stat. 112.0455 and Fl. Stat. 440. 102 as is enjoyed by white male and or female applicants for employment and or employment as a substitute teacher with the School Board who may and or may not have failed a drug test pursuant to marijuana on, before and after February 9, 2009 pursuant to the *Employment and Education Scheme* and or Tay Tay Terror Attack and shall be subject to like punishments, pains, penalties, taxes and exactions as a substitute teacher with the School Board on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or *Employment and Education Scheme* and or Tay Tay Terror Attack. Tay suffers damages as a result of the harm done to Tay and is therefore due relief under 42 USC § 1981A.

**COUNT 136 - EQUAL RIGHTS UNDER THE LAW**

**Pursuant to 18 USC § 1346 and 42 USC § 1981**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

1068. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

1069. Under Section 1981(a) Statement of equal rights; Tay within the jurisdiction of the United States, and or the State shall have the same right in the State and Territory of the United States to make and enforce contracts, to sue, be parties, give evidence, and to the full



and equal benefit of all laws and proceedings for the security of persons and property as is enjoyed by white citizens, and shall be subject to like punishment, pains, penalties, taxes, licenses, and exactions of every kind, and to no other.

1070. Defendants and or RICO Defendants used Target Discrimination to deprive Tay the intangible right to his Self Made American Dream of honest Judicial services on, before and after April 1, 2010 using mail and wires in violation of 18 USC §§ 1341 and 1343 to deprive Tay his right to honest services of Judicial proceedings on and after the April Fool's Order by stating "[Tay] is not eligible to teach in public schools due to his English syntax" knowing Tay was and is qualified to teach in any school pursuant to his application for employment as a substitute teacher with the School Board on and after February 10, 2009 pursuant to an Equal Employment Opportunity to make and enforce an Equal Employment Opportunity for a substitute teacher contract pursuant to Tay's drug test and or Florida Chain of Custody form and or Self Made American Dream pursuant to Fl. Stat. 112.0455 and Fl. Stat. 440. 102 and to the full benefit of all laws and proceedings for the security of Tay and his property pursuant to Fl. Stat. 112.0455 and Fl. Stat. 440. 102 as is enjoyed by white male and or female applicants for employment and or employment as a substitute teacher with the School Board who may and or may not have failed a drug test pursuant to marijuana on, before and after February 9, 2009 pursuant to the *Delayed Justice Scheme*, the *Employment and Education Scheme* and or Tay Tay Terror Attack and shall be subject to like punishments, pains, penalties, taxes and exactions as a substitute teacher with the School Board on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or *Employment and Education Scheme* and or Tay Tay Terror Attack. Tay suffers damages as a result of the harm done to Tay and is therefore due relief under 42 USC § 1981A.



**COUNT 137 - EQUAL RIGHTS UNDER THE LAW**

**Pursuant to 18 USC §§ 1346, 1349 and 42 USC § 1981**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**

1071. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as

if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

1072. Under Section 1981(a) Statement of equal rights; Tay within the jurisdiction of the

United States, and or the State shall have the same right in the State and Territory of the

United States to make and enforce contracts, to sue, be parties, give evidence, and to the full

and equal benefit of all laws and proceedings for the security of persons and property as is

enjoyed by white citizens, and shall be subject to like punishment, pains, penalties, taxes,

licenses, and exactions of every kind, and to no other.

1073. Defendants and or RICO Defendants used Target Discrimination in an attempt and or in a

attempt to conspire to commit mail, wire, health care, food stamp and bank fraud pursuant to

Chapter 63 of Title 18 to deprive Tay the intangible right to his Self Made American Dream

of honest employment and educational services on, before and after April 1, 2010 using mail

and wires in violation of 18 USC §§ 1341 and 1343 to deprive Tay his right to honest

services of honest employment and educational proceedings on and after March 5, 2009

pursuant to an Equal Employment Opportunity to make and enforce an Equal Employment

Opportunity for a substitute teacher contract pursuant to Tay's drug test and or Florida Chain

of Custody form and or Self Made American Dream pursuant to Fl. Stat. 112.0455 and Fl.

Stat. 440. 102 and to the full benefit of all laws and proceedings for the security of Tay and

his property pursuant to Fl. Stat. 112.0455 and Fl. Stat. 440. 102 as is enjoyed by white male

and or female applicants for employment and or employment as a substitute teacher with the

School Board who may and or may not have failed a drug test pursuant to marijuana on,





before and after February 9, 2009 pursuant to the *Delayed Justice Scheme*, the *Employment and Education Scheme* and or Tay Tay Terror Attack and shall be subject to like punishments, pains, penalties, taxes and exactions as a substitute teacher with the School Board on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or *Employment and Education Scheme* and or Tay Tay Terror Attack. Tay suffers damages as a result of the harm done to Tay and is therefore due relief under 42 USC § 1981A.

**COUNT 138 - EQUAL RIGHTS UNDER THE LAW**

**Pursuant to 18 USC §§ 1346, 1349 and 42 USC § 1981**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**  
1074. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as

if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

1075. Under Section 1981(a) Statement of equal rights; Tay within the jurisdiction of the United States, and or the State shall have the same right in the State and Territory of the United States to make and enforce contracts, to sue, be parties, give evidence, and to the full and equal benefit of all laws and proceedings for the security of persons and property as is enjoyed by white citizens, and shall be subject to like punishment, pains, penalties, taxes, licenses, and exactions of every kind, and to no other.

1076. Defendants and or RICO Defendants used Target Discrimination in an attempt and or in a attempt to conspire to commit mail, wire, health care and bank fraud pursuant to Chapter 63 of Title 18 to deprive Tay the intangible right to his Self Made American Dream of honest Equal Employment Opportunity services on about March 5, 2009 using mail and wires in violation of 18 USC §§ 1341 and 1343 to deprive Tay his right to honest services of an Equal Employment Opportunity pursuant to make and enforce an Equal Employment Opportunity for a substitute teacher contract pursuant to Tay's drug test and or Florida Chain of Custody



form pursuant to Fl. Stat. 112.0455 and Fl. Stat. 440. 102 and to the full benefit of all laws and proceedings for the security of Tay and his property pursuant to Fl. Stat. 112.0455 and Fl. Stat. 440. 102 as is enjoyed by white male and or female applicants for employment and or employment as a substitute teacher with the School Board who may and or may not have failed a drug test pursuant to marijuana on, before and after February 9, 2009 pursuant to the *Employment and Education Scheme* and or Tay Tay Terror Attack and shall be subject to like punishments, pains, penalties, taxes and exactions as a substitute teacher with the School Board on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or *Employment and Education Scheme* and or Tay Tay Terror Attack. Tay suffers damages as a result of the harm done to Tay and is therefore due relief under 42 USC § 1981A.

**COUNT 139 – FALSE LIGHT INVASION OF PRIVACY SCHEME**

**Pursuant to the 4<sup>th</sup> Amendment, 18 USC § 1346**

**Under the Pinkerton Doctrine Conspiracy, *Pinkerton v. United States*, 328 U.S. 640 (1946)**  
1077. Tay hereby incorporates by reference each and every prior paragraph of this Complaint as

if more fully set forth herein, and states in this claim any and all paragraphs *supra* the Complaint and attached Complaint exhibits. Substance prevails over form.

1078. Defendants used Target Discrimination in an attempt and or in a attempt to conspire to commit mail, wire, health care, food stamp and bank fraud pursuant to Chapter 63 of Title 18 to deprive Tay the intangible right to his Self Made American Dream of honest Equal Employment Opportunity services on about March 5, 2009 using mail and wires in violation of 18 USC §§ 1341 and 1343 to deprive Tay his right to honest services of an Equal Employment Opportunity to receive his Self Made American Dream on, before and after February 9, 2009 pursuant to the March 5, 2009 Document.

1079. Defendants and or RICO Defendants engaged in the Tay Tay Terror Attack in violation of mail, wire, bank, food stamp and health care fraud under 18 USC § Chapter 63 as defined



herein to illegally search, seize and violate Tay's privacy on, before and after February 9, 2009 pursuant to the March 5, 2009 Document in which resulted in being denied employment based on falsified drug test, which is therefore held in a false light pursuant to the March 5, 2009 Document and Tay's drug test, and or Florida Chain of Custody form while benefitting from the trafficking of Tay within the Tay Tay Terror Attack as, including but not limited to a School Board and State K-12 and or K-20 student, a School Board and State K-12 student athlete, organization leader, a employee applicant, a full time or part time employee, laborer, intern and or volunteer, a Full Time – First Time in College At Risk FAMU student- leader, a food stamp slave, business owner, and a God Fearing – educated black male from Cocoa by and through an religious, education, entrepreneurial, political, entertainment, edutainment and American Dream employment hoax (via Drug Free Workplace Act of 1988 and the Food and Nutrition Act of 2008 (SNAP) as amended 7 USC § 2011-2036) and other modern day human trafficking and racketeering schemes that permanently deprived Tay his right to an Equal Employment Opportunity, his pursuit to his American Dream, and his property and privacy [hereinafter, Tay's Exclusive Name and Likeness and Property] as a public figure pursuant to FL. Stat. 105.031, a consumer and private citizen pursuant to the Deceptive and Unfair Trade Practices Act ("DUTPA") as defined in Fl. Stat. § 501.201 and the Racketeer Influenced and Corrupt Organizations Act ("RICO"), 18 U.S.C. §1961 *et seq.* pursuant to 18 USC § 1346 ("Definition of scheme or artifice to defraud") and 18 USC § 1589 by means of force and serious harm, threats of force, physical restraint and serious harm while knowingly providing or obtaining the labor or services of Tay by means of the Defendants Scheme and RICO Enterprise to defraud Tay's name and likeness and their honest services including but not limited to the United States



Postal Service certified receipt service; food stamp program and employment search; equal employment opportunities; joint marketing and advertising entrepreneurship employment opportunities and services such as the Dell and Microsoft Vista Business (postage #03587083266 paid by Dell) and SCORE's New Business Startup Kit; K-20 education curriculum; a drug free workplace and proper chain of custody procedure; tutoring students; free print, copy and fax, and supporting United States veterans; communications service; email, internet and computer protection; justice; religion; faith based principles; life purpose and prosperity; property security and identity protection in a scheme for Tay to provide his Data Info to Defendants so they could traffic him through transactions and financial transactions with monetary instruments, programs, wires and devices for profit; to place and or return him to poverty through falsified writings and documents; defame his character through publications on the internet; and to make Tay a voluntary slave depriving him his intangible rights including but not limited to owning copyrighted and patented literary works, having #1 bestselling novel; having an safe and adequate learning environment; intrinsic reward of providing jobs to citizens; becoming a renowned businessman and author; earning a income; married with a family (8 USC § 1101(a)(35) "husband"); equal employment opportunities; employer relationships; help getting off food stamps; having a positive and accurate character persona as a public figure and private citizen; becoming a professional athlete; Tay's Self Made American Dream; teaching and educating students; awards and accolades as a State educator; having a BIG WIN in a lottery or gambling enterprise; providing for United State veterans through an illegal gambling operation; adequate relief and living; justice with having a fair and speedy trial; being in a landmark litigation; that God will make things happen and provide the gifts and treasures in the world if Tay pays tithe,



offering, pledge, building funds and other special offering to nonprofit religious institutions and is obedient, including but not limited to the following:

- a. Raise Tay as an adolescent child in a single parent household in Cocoa's poorest District utilizing religious institutions to develop Tay's character and faith in God (Christian and Rastafari), to market and advertise the American Dream<sup>195</sup>, an Equal Employment Opportunity, a quality education (as the "Future of Florida's Space Coast") and adequate living in Cocoa, Brevard and the State of Florida throughout the U.S. and foreign nations;
- b. Indulge Tay in the State of Florida's K-20 education curriculum with the School Board and FAMU forcing him to take and pass standardized tests to profit off of his intellectual property;
- c. Tay's campaign for Mayor of Cocoa in 2008 as a public figure and Christian religion likeness through the Christian Coalition of Brevard;
- d. Food stamp slave trade with the State and Chase;
- e. Denying Tay employment through the State of Florida's education system with Brevard Community College ("BCC") and the School Board of Brevard County;
- f. Sham 2009 Litigation judgments on and after April 1, 2010 by Gregory Presnell and other Justices in the Middle District of Florida – Orlando Division, the 11<sup>th</sup> Circuit Court of Appeals, and the U.S. Supreme Court;

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<sup>195</sup> Means the notion that the American social, economic, and political system makes success possible for every individual.



- g. Public humiliation through social media including but not limited to [www.msn.com](http://www.msn.com), [www.bing.com](http://www.bing.com) and [www.justia.com](http://www.justia.com) on the grounds of a falsified drug test, a false and defamatory statement that Tay “is not qualified to teach in Florida’s public schools,” and that Tay is “a vexatious litigator;” AND “Tay is a credit card thief;”
- h. Poverty enslavement on the grounds of denying Tay employment based on a falsified drug test; forcing Tay to survive on food stamps; the School Board offering Tay a \$50 offer of judgment; the Middle District of Florida – Orlando division denying Tay any and all equitable relief pursuant to his evidence exhibits and affidavits in the Sham 2009 Litigation; and placing Tay in homeless situations, attempting to manipulate Tay to become gay or a LGBT supporter.  
[hereinafter referred to as the “Tay Tay Terror Attack”]

**WHEREFORE**, pursuant to each and every count or claim for relief, Tay references each and every paragraph, *supra*, the Complaint in each and every count as a result of the acts, intentional and or misleading conduct and or misconduct on, before and after February 9, 2009 pursuant to the March 5, 2009 Document and or the Tay Tay Terror Attack. As a result of the harm done to Tay, *supra*, the Complaint, pursuant to each and every count, Tay suffers extreme damages, such as Tay’s livelihood, and prays for judgment as set forth below:

Good cause having been shown with the Complaint’s Opening Brief and Complaint Attachments provided, Tay, in **JESUS** name **PRAYS** and requests that this Honorable Court **GRANT** him the following relief:

1. Punitive, Economic and Non-Economic damages from Defendants and or RICO Defendants named in the above titled action, including but not limited to:



2. Declaratory Relief [Fat Boy Relief]:

- a. A non appealable order or sanctions against RICO Defendants individually, and or cohesively in any way, form by any and all means on the grounds of; time and duration of case, Tay's suffering human trafficking RICO Pro Se Plaintiff damages, clear and legitimate evidence of wrongdoing and the indulgence of unlawful activity by RICO Defendants on, before and after March 5, 2009 by P3's to traffic and torture Tay through the Tay Tay Terror Attack to defraud Tay with an American Dream Scheme;
- b. Tay seeks monetary relief in personal economic and non-economic damages, and special monetary relief for the violations of the herein actions pursuant to 18 USC § 1964(a)(c) and or 42 USC § 1983 and or §1981a(b) and or any other herein statutes that indicate and or give Tay any grounds for relief;
- c. Emergency Relief pursuant to 42 USC §§ 10602, and 10603b(b) ("Compensation and assistance to victims of terrorism"), including but not limited to living, transportation and marijuana healthcare; Adequate living relief:
  - i. Tay is not a frivolous and vexatious litigator as defined in Fl. Stat § 68.093.
  - ii. A \$10 million Fat Boy Relief Emergency voucher from the State with paid home insurance by Brevard, light (FPL), water (City of Cocoa), television and internet (Brighthouse) for 28 years;
  - iii. A custom 2014 Rolls Royce Wraith amongst other things from Rolls Royce North America including audio, technology, interior, rims and tires with paid insurance from Progressive Auto Insurance;



- iv. Nationwide legal medicinal marijuana license;
  - v. A \$3, 650 gas card voucher to any BP gas station in the United States;
3. Declare that Tay is a qualified Florida educator, and demand Rick Scott and Obama to issue Tay a never expiring Professional Teaching Certificate in and for the State of Florida and any state within jurisdiction of the United States;

Declare that all footnotes in this Complaint are admissible evidence and information pursuant to the below, Oath and Declaration; and not to omit and or disregard Doc. 46. Footnote 2 “nefarious scheme order” in Sham 2009 Litigation;

- a. Declare that Tay is a victim suffering from severe modern human trafficking as a Hidden Slave and Exclusive Name and Likeness.
- b. Relief that tolls Tay’s March 5, 2009 Document from the School Board, from March 5, 2009 – April 1, 2010, allowing Tay’s statute of limitations to be tolled about 3 years extra time from the time of the March 5, 2009 Document which led to multiple civil court filings on the grounds of a fraudulent and void judgment, abuse of discretion and fraudulent conclusions of law of consolidated evidence on and after April 1, 2010;
  - i. Tay is not a frivolous and vexatious litigator as defined in Fl. Stat § 68.093. Tay has not filed a false complaint with malicious intent nor outrageous intent to harm, aggravate, vexate or humiliate Defendants. Each Defendant played a role and or benefitted from Tay Tay Terror Attack to permanently injure Tay based upon the attached documents in the 2009 Sham Litigation and other court proceedings and papers thereafter.





- ii. Tay is not accused of or liable for any attorney or court fees and costs and or fine for reckless disregard for displaying content of documents or papers as related, filed and or will be filed by Tay on sites such as Facebook and Tay's expired Mayor website or his personal website with malicious intent to publicly harm the reputation or likeness of particular RICO Defendants, including but not limited to Leroy Berry and Barack Obama, because statements Tay may have made about Defendants were true and or done out of the severe and extreme emotional distress he suffers.
- c. Relief ordering Defendant, State and School Board, to release to Tay a DVD copy of his public hearing on May 10, 2012 between he, Cocoa and the School Board with Hon. George Maxwell III presiding in the 18<sup>th</sup> Judicial Circuit in and for Brevard County, FL, without dissemination for public view and waiving the \$25 DVD copy fee.
- 4. Declaratory relief mandating that Tay's rights were deprived from him and them in the course of acquiring and obtaining his American Dream, including but not limited to being prejudicially discriminated against in educational employment as a substitute teacher because he and they are a black male based on a falsified drug test.
- 5. Declare Tay is living below the poverty line through multiple schemes to defraud Tay's Exclusive Name and Likeness and Property, and trafficked him through said mails and wires in the Tay Tay Terror Attack, including but not limited to peonage, slavery, and trafficking;
  - a. Tay is a modern day slave trafficking victim from the Tay Tay Terror Attack;



- b. Tay has been tortured, threatened by means of force and physical restraint, through means of force, by means of serious harm or threats of serious harm in Prison Poverty through Defendants Weapons of Mass Destruction and Tay Tay Terror Attack;
6. Declaratory relief ceasing the “War on Drugs” to reduce the illegal drug trade<sup>196</sup> pursuant to 21 USC § 814.
- a. Relief from the United States to FAMU pursuant to 21 § 360-bbb-5 (Critical Path Partnership) for the research and education for marijuana and other pharmaceutical drugs to conduct, assist, and foster research for a cure for particular cancers and other diseases in the amount of \$4 million jointly for the College Of Pharmacy and College of Arts and Sciences (Biology).
7. Exclusive Declaratory Relief for a \$3.65 billion grant from RICO Defendants enjoined, entitled the “Let Me Upgrade Ya<sup>197</sup>” Grant to Tay and his new and future corporation to make significant upgrades in Education, Employment, and Entrepreneurship to stimulate Cocoa, Brevard and the State’s economy and citizens adequate living standards from Obama and the State pursuant to 20 USC § 802 (Fellowships for City Planning).
8. Special and miscellaneous relief pursuant to punitive compensation from each appeared Defendant in the amount of **\$50, 500. 27**<sup>198</sup> (approx. about 3.65 years of a full time substitute teacher’s salary); **\$29, 700** for unemployment benefits that he could not be eligible to receive due to the deeply rooted scheme for 99 weeks at a rate of \$300/wk to

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<sup>196</sup> Only ending the War on Marijuana a/k/a/ “Gunja” and not any other drug the U.S. and any other International Government seeks to prohibit.

<sup>197</sup> <http://smith4cocoamayor.webs.com/letmeupgradeya.htm>

<sup>198</sup> See <http://www.nctq.org/admin/ExcelOutput?id=2>; \$8.75 per hour for Substitute teachers with at least a Associate of Arts degree.



make him ineligible; **\$8, 000** for \$200/month for 4 years receiving and relying on the food stamp and employment programs individually and jointly to receive employment in Brevard County.

9. Declare that the State adopt into legislation and made a Florida Statute, Tay's proposed marijuana and cannabis Florida legislation as entitled: "The FLA Tay Tay Ganja Legislation" including but not limited to exclusive, recreational, religious, and healthcare use for education, employment, medical patients and incarceration [The Tay Tay FLA Prisoner Rehabilitation Act] purposes and or any other purposes; and that no appeal sanction, injunction or any other effort to make any claim or complaint to change, alter and or amend the proposed title for purposes and;
10. Declaratory relief mandating the United States [Barack Obama] "discharge petitioner to permit a floor debate" to pass the "Ending Federal Marijuana Prohibition Act of 2011," amending the title to "*The Tay Tay – USA Mind, Body and Soul Ganja Act*", and the State [Florida], it's House and Senate "discharge petitioner to permit a floor debate" to legalize marijuana under the title: "*Cathy J. -Tay Tay Mean To Go Green for the Respectful and Responsible Adults of Florida Act by the Jenks Rule*" amending the State's Senate Joint Resolution 1028 and or Senate Bill 1250 ("Cathy Jordan Medical Cannabis Act") titles and approved by the U.S. Food Drug and Alcohol (FDA) as a legal, safe and beneficial drug in the State under the *Cathy J. and Tay Tay Mean 2 Go Green for the Respectful and Responsible Adults of Florida Act by the Jenks Rule* to allow citizens, guest, educators, athletes and professionals buy, sell and purchase medicinal marijuana in that State and not be discriminated against for employment based upon the sole use of marijuana.



- a. The State must adopt a State version of the United States proposed Bill S. 1038 – End Racial Profiling Act of 2013<sup>199</sup>;
- b. The State must amend FL. Stat. 760.10(6) “Florida Civil Rights Act” and or FL. Stat. 112.0455(8) “Procedures and Employment Protection” or (9) “Confirmation Testing” and or FL. Stat. 440. 102 “Drug-free workplace program requirements” as such: “It is an unlawful employment practice for an employer, labor organization, employment agency, or joint labor-management committee to discharge or to fail or refuse to hire any individual, or otherwise to discriminate against any individual with respect to compensation, terms, conditions, or privileges of employment, because he or her consumes marijuana for religious or recreational use in a professional workplace unless by consuming marijuana it effects that persons work performance and or harms the people around them.”
- c. Declaratory relief ceasing the “War on Drugs” to reduce the illegal drug trade<sup>200</sup> pursuant to 21 USC § 814:
- d. Relief from the United States to FAMU pursuant to 21 § 360-bbb-5 (Critical Path Partnership) for the research and education for marijuana and other pharmaceutical drugs to conduct, assist, and foster research for a cure for cancer and other diseases in the amount of \$4 million jointly for the College Of Pharmacy or the College of Arts and Sciences (Health Science, Agriculture and Biology).
- e. Declaratory order mandating that the State give Tay an “*Exclusive Lifetime All Sports - All Access VIP Identification Card*” for exclusive benefits for any athletic

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<sup>199</sup> See <http://www.govtrack.us/congress/bills/113/s1038>.

<sup>200</sup> Only ending the War on Marijuana a/k/a/ “Ganja” and not any other drug the U.S. and any other International Government seeks to prohibit.



events at any venue in the United States. Rather it is high school, college, and/or professional. Benefits include: free admission with up to (3) tickets for a seat; if a football game, Tay and his guest should be provided with special sideline access passes on either contestant's side as an exclusive Florida V.I.P. guest.

- f. Declaratory order mandating the NBA issue Tay an Orlando Magic V.I.P. package including (2) courtside seats on row 1, seat 1 on the Orlando Magic bench for (10) basketball seasons starting from date of Ordered relief.

11. Declaratory Relief pursuant to 42 USC § 9901(2)(1) (Purpose and Goals), §9925 (Demonstration Partnership Agreements Addressing Needs of Poor), §9926 (Project to expand the number of opportunities available to low income communities), 20 USC § 802 (Fellowships for City Planning) from Federal Government RICO Defendants, Money Bank RICO Defendants and Communication RICO Defendants enjoined to provide a \$3.65 billion "Florida's Space Coast Poe Boy Grant" to Tay for the planning and economics development of low income African American communities over 25 years in Cocoa and Florida's Space Coast.
12. Grant Tay Exclusive Special Relief pursuant to 18 USC § 1593 ("Mandatory Restitution"), §1593A ("Benefiting financially from peonage, slavery and trafficking"), §1595 ("Civil Remedy"), and 22 USC § 7701 ("Purposes"), 18 USC § 1956(b)(3) ("Court authority over assets"); 42 USC § 9926 ("Projects to expand the number of job opportunities to low income communities"); § 9925 ("Demonstration partnership agreements addressing needs of poor"); § 9901 ("Purpose and Goals").
13. Declaratory relief ordering the State of Florida ("Florida Bar") to grant Tay a honorary law degree from FAMU College Of Law, Tay must take the oath of the Florida Bar, Tay



must receive a Florida Bar Attorney Number and be recognized as Dr. Dontavious S. “Tay” Smith, J.D. and or Dontavious S. “Tay” Smith, Ph.D., J.D with an exclusive honorary ceremony in the FAMU College of Law in the Moot Courtroom in Orlando, FL with permission to practice in any and all Florida State and federal courts with exclusion of paying any fees, taking the Florida Bar and or any other Bar exams to qualify as a legitimate attorney in the State of Florida.

14. Declaratory judgment mandating FAMU to declare Tay “*The Lifetime Primetime - Mr. FAMU*” and issue him a Honorary Chief Master’s degree in Love and Service; and a FAMU Chief Doctorate degree in World Humanity and African American Economic Development signed by; the FAMU President, the Governor of Florida, President of the United States of America, United States Attorney General, Exec. Dir. Of Congressional Black Caucus, the Secretary of the U.S. Department of Education; and the NASA Administrator, Charlie Bolden:
  - a. Creating a special “Lifetime - V.I.P.” seat for Tay on the Florida A&M University Board of Trustees and Student Affairs Committee Chairman to blueprint the “*Tangerine-Green Fresh From Florida Education Initiative.*” Implementing a fresh, deeply rooted education atmosphere at the Florida A&M University;
  - b. A full body monumental statute in front of Coleman Library on the campus of FAMU of Tay’s Image and Likeness, and Name and Likeness with the title: “*Mr. 321 Lifetime Primetime – FAMU* and the motto “*Rattler of Faith, Love, Perseverance and Service*”;



- c. Automatic induction of Harry T. and Harriot T. Moore, and Tay into the *Florida Civil Rights Hall of Fame*, with face sculpted plaques and paintings to honor the herein mentioned pursuant to Fl. Stat. 760.065 – Civil Right Hall Of Fame.
  - d. Reliefs that require the State and United States relieve Tay from incurred Federal and private Student loans from his collegiate education. Allowing him to have a debt balance of \$0.00, owing any financial institution nothing for his collegiate education.
15. To award Tay full immunity pursuant to 18 USC § 6002 (“Immunity Generally”) from any future arrest for any misdemeanor and or felony criminal charges and entrapment by and for admitting illegal marijuana use and possession<sup>201</sup> and or distribution, exchanging food stamps (SNAP) benefits for cash for necessities, and working under the table tax free pursuant to FL. Stat. 112.31901, and or misleading and deceptive advertising as a FAMU Bachelor of Arts – School of Arts and Sciences Spring 2008 graduate and any other civil or criminal wrongdoing as stated herein and or revealed through discovery and disclosure.
16. Declaratory relief mandating that single, black, African American males, without children in Florida are eligible and awarded at least \$200 in SNAP benefits in Florida and at least \$165 in cash assistance; any other race and or gender in any other State are awarded at least \$100 in cash assistance.
17. Declaratory relief mandating that Tay’s rights were deprived from him in the course of acquiring and obtaining his American Dream, including but not limited to being prejudicially discriminated against in educational employment as a substitute teacher because he are a black male based on a falsified drug test.

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<sup>201</sup> See Florida Criminal Code 893, Florida Criminal Code § 775.082(a), Florida Criminal Code 322.271



18. Declaratory judgment that allows Tay to be the official spokesperson for the State of Florida, its lottery ("flamingo"), and its "Fresh From" or "Fresh From Florida" logos and marks by the Florida Department of Agriculture brands with a Tay Tay Exclusive Name and Likeness fee over 5 years.
19. Declaratory relief that mandates any and all State incarcerated inmates and ex-convicts that have a Dope Boy marijuana charge in and for the State is expunged from any personal and or criminal record and background. Pursuant to The laws and rules which govern expunction or sealing of criminal history record(s) include: Sections s.943.0585 - s.943.059, Florida Statutes and Chapter 11C-7, Florida Administrative Code.
20. Declaratory relief ordering Tay, MSNBC [Comcast] and Tamron Hall produce an MSNBC Original entitled: "*Black Man: Stand Your Ground; The Florida Boy Edition*". Tay is Executive Producer MSNBC Original. This documentary must be taped primarily in Cocoa, FL and Tallahassee, FL and on the campus of FAMU.
21. Declaratory relief mandating the United States of America participating in a money market that has Cocoa as a commonly traded commodity issue Tay 3.65% of the Cocoa common stock commodity in any of the desired stock index's with the stock symbol (CC).
22. Declaratory relief that mandates Nike Inc. to:
  - i. Give Tay a \$3,650 yearly product credit on selective apparel. (i.e. Jordan, Tiger Woods, Lebron James, Roger Federer, Air Max, Air Stab)
  - ii. Put Tay on billboards on Interstate 95 in Brevard County in and near Cocoa; Miami Beach; and in Tallahassee, FL representing Brand Jordan, Roger Federer, Nike and Tiger Woods [Nike] licensed products.





- iii. Make Tay an official “Become Legendary” legend of Brand Jordan and endorse him with 3.65% equity in Nike Inc. as his salary over 7 years.
  - iv. Provide all students in any and all Brevard public and charter schools, FAMU students a “Back to School TAYke Cover” benefits packet; with a Nike book bag included with: at least (1) pair of shoes (Nike Air Force 1); 1 pair of Brand Jordan or Nike slides; (2) T shirts; 1 pack of (3) Nike Elite or low cut ankle socks, and a jacket for the winter season during their respective school year.
  - v. To sponsor and or endorse all Brevard Public Schools as Nike schools; elementary, middle and high schools. Rockledge High School and McNair Magnet are exclusively Brand Jordan schools.
  - vi. To sponsor and endorse Florida A&M University as a Brand Jordan school for 20 years for all sports and academia schools.
  - vii. To sponsor and endorse Bethune Cookman University as a Nike school for 20 years for all sports and academia.
23. Declaratory relief ordering Web Partner Program to give each enrolled Brevard Public School (elementary, middle and high school) student a least (1) time, a touch screen iPad and or HP laptop with innovative educational applications pre-installed and a basic printer for 10 years.
24. will individually sponsor \$3,650, 000.00 in renovations to McNair Magnet School, Rockledge High School and FAMU’s School of General Studies; approximately \$1.26 mm to each school.



25. Declaratory Relief pursuant to 20 USC § 1067q(C) (Investment in HBCU's and other minority institutions) from RICO Defendants enjoined to provide a \$3.65 billion Florida HBCU education grant for State public and private HBCU institutions in the State including; FAMU, BCU (Bethune Cookman University), Florida Memorial College (FMC) and Edward Waters College (EWC).

- a. FAMU shall be allotted \$125 million;
- b. The remaining \$240 million must be equally split amongst the 3 remaining HBCU colleges in the State.

26. To declare Tay the enjoyment of life:

- a. Declaratory order mandating that the State give Tay an "*Exclusive Lifetime All Sports - All Access VIP Identification Card*" for exclusive benefits for any athletic events at any venue in the United States. Rather it is high school, college, and/or professional. Benefits include: free admission with up to (3) tickets for a seat; if a football game, Tay and his guest should be provided with special sideline access passes on either contestant's side as an exclusive Florida V.I.P. guest.
- b. Declaratory order mandating the NBA issue Tay an Orlando Magic V.I.P. package including (2) courtside seats on row 1, seat 1 on the Orlando Magic bench for (10) basketball seasons starting from date of Ordered relief.

27. Declaratory Relief pursuant to 42 USC § 9901(2)(1) (Purpose and Goals), §9925 (Demonstration Partnership Agreements Addressing Needs of Poor), §9926 (Project to expand the number of opportunities available to low income communities), 20 USC § 802 (Fellowships for City Planning) from Federal Government RICO Defendants, Money Bank RICO Defendants and Communication RICO Defendants enjoined to provide a



\$3.65 billion “Florida’s Space Coast Poe Boy Grant” to Tay for the planning and economics development of low income African American communities over 25 years in Cocoa and Florida’s Space Coast.

28. Grant Tay Exclusive Special Relief pursuant to 18 USC § 1593 (“Mandatory Restitution”), §1593A (“Benefiting financially from peonage, slavery and trafficking”), §1595 (“Civil Remedy”), and 22 USC § 7701 (“Purposes”), 18 USC § 1956(b)(3) (“Court authority over assets”); 42 USC § 9926 (“Projects to expand the number of job opportunities to low income communities”); § 9925 (“Demonstration partnership agreements addressing needs of poor”); § 9901 (“Purpose and Goals”).
29. Declaratory Relief pursuant to 20 USC § 1067q(C) (Investment in HBCU’s and other minority institutions) from RICO Defendants enjoined to provide a \$3.65 billion Florida HBCU education grant for State public and private HBCU institutions in the State including; FAMU, BCU (Bethune Cookman University), Florida Memorial College (FMC) and Edward Waters College (EWC).
  - a. FAMU shall be allotted \$125 million;
  - b. The remaining \$240 million must be equally split amongst the 3 remaining HBCU colleges in the State.
30. Declaratory judgment mandating Defendants: Nike, Microsoft, McDonald’s 365black.com sign and agree to joint marketing venture agreements from 5 - 7 years worth at least a total of \$1 billion [“America’s Billion Dollar Brand Man”] per each Defendant, to market and advertise licensed products and or create certain products under Tay’s Name and Likeness;



31. A “Deeply Rooted 365 Apology”; a 365 word, 10 word sentences, 5 paragraph letter of apology from each RICO Defendant’s CEO, President and or Executive Officer or Chief Executive Officer.
- a. Certified Mail Return receipt; official letterhead, signed in black ball point pen by.
32. Declaratory relief mandating Microsoft and the State of Florida entitle Tay, “Mr. Sunshine Connect,” and will individually sponsor \$3,650, 000.00 in renovations to McNair Magnet School, Rockledge High School and FAMU’s School of General Studies; approximately \$1.26 mm to each school.
- a. A life-sized monument of Tay’s Image and Likeness are to be placed on the campuses of Rockledge High School and a noticeable place in the SBE (State Board of Education) building in Tallahassee, FL.
33. Other exclusive, special, nominal general, punitive, consequential, proximate, compensatory and other damages the Court deems just.
34. Actual Damages and Costs. Costs and damages are shown in itemized listing in exhibits
35. Grant Tay Exclusive Special Relief pursuant to 18 USC § 1593 (“Mandatory Restitution”), §1593A (“Benefiting financially from peonage, slavery and trafficking”), §1595 (“Civil Remedy”), and 22 USC § 7701 (“Purposes”), 18 USC § 1956(b)(3) (“Court authority over assets”); 42 USC § 9926 (“Projects to expand the number of job opportunities to low income communities”); § 9925 (“Demonstration partnership agreements addressing needs of poor); § 9901 (“Purpose and Goals”).
36. That the Court award restitution and disgorgement in favor of Tay’s through its equitable powers, and through Federal and State law.



37. As the First Circuit has observed, "can it really be disputed that intentionally discriminating against a [B]lack man on the basis of his skin color is worthy of some outrage?" *Rowlett v. Anheuser-Busch*, 832 F.2d 194, 206, 44 EPD Par. 37,428 (1st Cir. 1987). The degree of egregiousness and nature of the respondent's conduct should be considered. See Restatement (Second) of Torts, § 908(2). In *EEOC v. Gaddis*, 733 F.2d 1373, 1380, 34 EPD Par. 34,348 (10th Cir. 1984), the court held that allowance of punitive damages "involves an evaluation of the nature of the conduct in question."
38. The employer's actions after it was informed of discrimination should be considered. An employer who has notice of discriminatory conduct and fails to take action could incur punitive damages. See *Yarbrough v. Tower Oldsmobile*, 789 F.2d at 514-15.
39. The award should be considered in the context of the respondent's monetary resources. The amount of punitive damages should "sting," but not "destroy" the respondent. *Keenan v. City of Philadelphia*, 55 FEP Cases at 944-45.
40. Punitive damages are available only where the respondent acted with "malice or with reckless indifference to the federally protected rights of an aggrieved individual." Section 1981A(b)(1). The standard for awarding punitive damages under § 1981 is whether the defendant acted with malice, an evil motive, or recklessness or callous indifference to a federally protected right. *Stephens v. South Atlantic Cannery, Inc.*, 848 F.2d 484, 489, 46 EPD Par. 38,032 (4th Cir. 1988), cert. denied, 488 U.S. 996 (1988). Additionally, under § 1983, plaintiffs may recover punitive damages when "the defendant's conduct is shown to be motivated by evil motive or intent, or when it involves reckless or callous indifference to the federally protected rights of others." *Smith v. Wade*, 461 U.S. 30, 56 (1983); *Garza v. City of Omaha*, 814 F.2d 553, 556, 43 EPD Par. 37,072 (8th Cir. 1987) (punitive



damages under § 1983 "may be awarded where the defendant exhibits oppression, malice, gross negligence, willful or wanton misconduct, or reckless disregard for the civil rights of the plaintiff").

41. There is direct evidence of actual damage and, in addition, real injury could be inferred from the facts. See also *Duncan v. Barnes*, 5Cir. 1979, 592, F 2d. 1336.

42. That the Court award Tay all damages determined to have been sustained by him as a result of Defendants conduct as complained herein.

43. Tay Demands a trial by jury.

I HEREBY certify that Tay's Summons and copy of this Complaint to be served on the Defendants by the U.S. Marshal's. Service is affected by the U.S. Marshal only when specifically ordered by the court. In general, such court-ordered service will be limited to cases where the plaintiff is authorized by the court to precede *in forma pauperis* under 28 USC 1915. Further that the above are true and correct copies and caused to be sent to the Defendant at locations identified in Summons.

Dated:      September    15,      2014

Sincerely Submitted,



Dontavious "Tay" Smith, *Pro Se*.  
807 South Wilson Avenue  
Cocoa, FL 32922  
[flanative\\_cocoa321@hotmail.com](mailto:flanative_cocoa321@hotmail.com)

### **OATH AND DECLARATION**

I, Dontavious "Tay" Smith, swear and declare as follows:

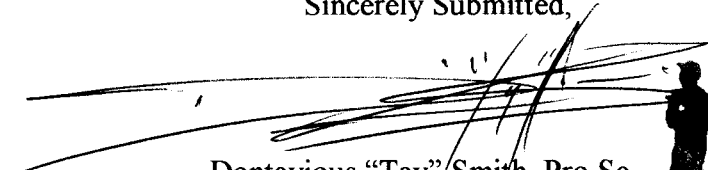


1. I am the indigent, Pro Se Plaintiff in this action.
2. Tay declares and objects to any Report and Recommendation by any Middle District of Florida – Orlando Division Judge and Magistrate Judge, and any other Court and Judges denying any of Tay’s pending motions and directions to close this case based on his evidence pursuant to the Federal Rules of Evidence (via FL. Rules of Evidence) Rule 401 (FL. 90. 401) – Definition of relevant evidence, Rule 402 (FL. 90.402) – Admissibility of relevant evidence, Rule 404 (FL. 90. 404) – Character Evidence, Rule 405 (FL. 90. 405) – Methods of proving character, Rule 407 (FL. 90.407) – Subsequent Remedial Measures, Rule 408 (FL. 90.408) – Compromise Offers and Negotiations, Rule 901 (FL. 90.901) – Authenticating or Identifying Evidence, Rule 902 (FL. 90.902) – Evidence that is Self-Authenticating pursuant to the herein April Fool’s Order.
3. Tay declares under Rule 11 of the Federal Rules of Civil Procedure, to certify that, to the best of his knowledge and belief, the legal contentions "are warranted by existing law or by a nonfrivolous argument for the extension, modification, or reversal of existing law or the establishment of new law".

I certify under penalty of perjury under the laws of the United States of America that the foregoing and herein statements are true.

Signed in Cocoa, FL on Date: September    15,    2014

Sincerely Submitted,

  
Dontavious "Tay" Smith, Pro Se.  
807 South Wilson Avenue  
Cocoa, FL 32922  
[Flanative\\_cocoa321@hotmail.com](mailto:Flanative_cocoa321@hotmail.com)

